

EXHIBIT 1

Deposition of Jeramy Edgel

Condensed Transcript of the
Testimony of

Jeramy Edgel

Volume I

Date: February 13, 2017

Grecia Echevarria-Hernandez v. Affinitylifestyles.com, Inc.
Case No. 2:16-cv-00943-GMN-VCF

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<p>1 UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA 3 GRECIA) 4 ECHEVARRIA-HERNANDEZ,) Individually,) 5) Plaintiff,) 6 vs.) No. 2:16-cv-00943-GMN-VCF 7) AFFINITYLIFESTYLES.COM,) INC. d/b/a REAL ALKALIZED) 8 WATER, a Nevada) corporation; DOES I-X; and) 9 ROE BUSINESS ENTITIES I-X,) inclusive,) 10 Defendants.) 11 _____) 12) 13) 14 DEPOSITION OF JERAMY EDGEL 15 Taken on Monday, February 13, 2017 16 By a Certified Court Reporter 17 At 10:11 a.m. 18 At 8816 Spanish Ridge Avenue 19 Las Vegas, Nevada 20) 21) 22) 23) 24 Reported by: MARY COX DANIEL, FAPR, RDR, CRR, CCR 710 25 Job No. 20417</p>	<p>1 INDEX 2 WITNESS: JERAMY EDGEL 3 PAGE 4 Examination By Mr. Gutierrez 5 Examination By Ms. Ginapp 83 5 Further Examination By Mr. Gutierrez 123 6 7 INDEX TO EXHIBITS 8 Exhibit Page 9 1 Subpoena to Testify at a 43 Deposition in a Civil Action, 10 To: Jeramy Edgel 11 2 Intake paperwork for Grecia 44 Echevarria, Bates labeled 12 RW-000001-15 13 3 Employment Agreement, Bates 47 labeled RW-000016-28 14 4 "Message to Garcia" Video 52 15 Review, Bates labeled RW-000031-32 16 5 "The Secret" Review 52 17 6 "The Way to Happiness" Video 52 18 Review 19 7 Real Water Course Memo, Bates 19 labeled RW-000060-61 20 8 Non-Optimum Reports, Bates 67 21 labeled PLTF00001-6 22 23 24 25</p>
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<p>1 APPEARANCES: 2 For Plaintiff: 3 MAIER GUTIERREZ AYON BY: JOSEPH A. GUTIERREZ, ESQ. 4 8816 Spanish Ridge Avenue Las Vegas, NV 89148 5 For Defendants: 6 7 LEWIS, BRISBOIS, BISGAARD & SMITH, LLP BY: KRISTOL BRADLEY GINAPP, ESQ. 8 6385 South Rainbow Boulevard Suite 600 Las Vegas, NV 89118 9 10 Also Present: David Gardner 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 (Exhibits Continued) 2 9 Final Paycheck Receipt 67 Acknowledgment; Separation 3 Certificate; List of Prior 4 Inventions and Original Works of Authorship; Nevada Labor Code Section 2870, Bates 5 labeled RW-000046-49 6 10 Real Water Product 67 Demonstration Reports, Bates 7 labeled RW-002424-2435 8 11 E-mails, Bates labeled 67 RW-002437-2455 9 12 Notice of Charge of 67 10 Discrimination, Bates labeled RW-000066-68 11 13 Printout of text messages, 67 12 Bates labeled PLTF00185-200 13 14 Excerpts from Basic Study 29 Manual Course, beginning with Bates label RW-000149 14 15 16 17 18 19 20 21 22 23 24 25</p>

1 (A discussion was held off the record between the court
2 reporter and counsel, wherein counsel present agreed to
3 waive the reporter requirements as set forth under NRC
4 Rule 30(b)(4) or FRCP Rule 30(b)(5), as applicable.)

5 JERAMY EDGEL,
6 having been first duly sworn to testify to the truth,
7 the whole truth and nothing but the truth, was examined
8 and testified as follows:

9
10 EXAMINATION

11 BY MR. GUTIERREZ:

12 Q Good morning. Can you state and spell your
13 name for the court record?

14 A Jeramy Edgel. J-E-R-A-M-Y. Last name Edgel,
15 E-D-G-E-L.

16 Q Have you ever had your deposition taken
17 before?

18 A I never have.

19 Q Have you ever testified in court?

20 A I have at my own court hearing.

21 Q What was that for?

22 A Criminal case in 2004.

23 Q I just want to go over some of the ground
24 rules of the deposition --

25 A Wait. Actually, I didn't testify at that.

1 Q You did not?

2 A I did not, now that I think about it.

3 Q So you never stood in front of a judge and
4 raised your right hand to give an oath?

5 A Right.

6 Q Okay. I just want to go over some of the
7 ground rules of depositions so you're familiar with the
8 process and we're on the same page.

9 The oath you just took is the same oath that
10 you would take if you were in a court of law and you
11 were testifying in front of a judge and a jury. Okay?
12 Do you understand that?

13 A I have a lot of friends that are in law
14 enforcement, and they've explained this to me.

15 Q Perfect. So another rule that we have is
16 because the court reporter is taking down my questions
17 and your answers, it's important for you to let me
18 finish each question before you respond to we can have
19 a clean deposition transcript. Do you understand that?

20 A Got you, yeah.

21 Q It's also important to wait because counsel
22 for Real Water may have an objection. If she objects,
23 it's for the court record. And we still have expect
24 you to answer the question. Okay?

25 A Okay.

1 Q If any questions I ask you don't make sense,
2 or you need me to rephrase it, just let me know. What
3 we're trying to do here is just get your testimony
4 about your time working at Real Water. Okay?

5 A (Witness nods head).

6 Q And that's another rule, too. You can't nod.

7 A Yes, she can't notate the nod.

8 Q She can't take your nodding of the head, or
9 "uh-huh." So make sure all your answers are verbal.

10 A No worries.

11 Q I don't think we'll be here too long, but if
12 you need a break, just let me know. Okay?

13 A Okay.

14 Q Can you give us an overview of your
15 educational background?

16 A I attended high school at Cheyenne High
17 School, and then dropped out when I was a junior. And
18 then I finished high school at Adult High, which is
19 through Clark County School District; and then attended
20 college at College of Southern Nevada.

21 Q What did you study at the College of Southern
22 Nevada?

23 A GA, just a general associate's degree, but
24 mostly marketing and entrepreneurship.

25 Q Did you get any degrees there?

1 A I did not.

2 Q Did you go to any other colleges or
3 universities?

4 A No.

5 Q Tell us about your work experience prior to --
6 or, following college.

7 A Mostly it's been sales, sales and politics. I
8 got my real estate license in 1999, and started selling
9 timeshares at Polo Towers and worked for a number of
10 developers. Was very successful at that. That's what
11 I'm doing now, working for Hilton Grand. So, mostly
12 sales. And politics is very closely related to sales,
13 just sales on a bigger sale.

14 Q You said you're working currently for Hilton?

15 A Hilton Grand Vacation Club.

16 Q What's your position there?

17 A In-house sales.

18 Q How long have you been in that position?

19 A Just started.

20 Q A few weeks? A month? How long has it been?

21 A I start boot camp this week.

22 Q Prior to working at Hilton Grand Vacation
23 Club, you worked at Real Water; correct?

24 A Yes.

25 Q What was your position at Real Water?

1 A I started in sales, and then became director
 2 of sales, and then became the vice president of sales
 3 and distribution. At one point, I was a vice president
 4 of sales, distribution, and human resources. And that
 5 was quite a headache, in which case we, I think, put
 6 Aimee over human resources managing Shawna. I don't
 7 recall Shawna's last name.
 8 Q Is that Aimee Jones?
 9 A Yeah.
 10 Q When did you start working at Real Water?
 11 A Right after the election. The election was on
 12 the 10th. And so I took a week off because during the
 13 election, you're going seven days a week, a million
 14 hours a day. So it would have been November of 2014.
 15 An exact date, I don't have off the top of my head, but
 16 probably like the 17th, would make sense.
 17 Q Were you working for Brent Jones on his
 18 campaign at that time?
 19 A Yeah. I ran his ground game.
 20 Q For when he ran for State Assembly in 2014; is
 21 that correct?
 22 A Correct. I ran his ground game in the
 23 primary. And then also ran his ground game in the
 24 general as well.
 25 Q How did you get the job at Real Water? Did

1 Brent offer you the position following your work with
 2 him in politics?
 3 A Yeah. He saw how I could manage other human
 4 beings on the campaign, and the sales ability, and
 5 thought it would be a good fit.
 6 Q So from 2014 to -- well, when did you leave
 7 Real Water?
 8 A January 7th of 2017.
 9 Q What was the reason you left the company?
 10 A A lot of crazy stuff, man. We just weren't
 11 vibing anymore.
 12 Q What does that mean?
 13 A I worked for Brent for a long time. And it
 14 just -- we were just having a conflict that didn't make
 15 sense. He's kind of a "my way or the highway" type of
 16 guy. And just didn't make sense. I had better
 17 financial opportunities elsewhere. At Hilton, I can
 18 make more a month than I made a year there.
 19 Q Did you take a leave of absence at all prior
 20 to you leaving the company?
 21 A Yeah.
 22 Q What was that for?
 23 A I was sent to Florida to go to what's called
 24 Narconon.
 25 Q I'm sorry. What is it?

1 A It's called Narconon --
 2 Q Okay.
 3 A -- which is a rehab facility that is
 4 supposedly non-denominational, but is Scientology, is
 5 like a Scientology boot camp. It's like an
 6 introductory to Scientology.
 7 Q Who sent you to that boot camp?
 8 A The Joneses.
 9 Q When you say "the Joneses," you're talking
 10 about Aimee and Brent Jones; is that correct?
 11 A Yeah.
 12 Q Now, during the deposition of Brent Jones on
 13 December 28th, 2016, he testified that you were in
 14 rehab, that you were on a leave of absence, you were in
 15 rehab. That's the rehabilitation he was talking about?
 16 MS. GINAPP: Objection. Form. Foundation.
 17 BY MR. GUTIERREZ:
 18 Q You can answer.
 19 A I wasn't there at that point in time. I left
 20 on Christmas Eve, on December 24th.
 21 Q Tell me about the circumstances of the Joneses
 22 sending you to this rehabilitation facility.
 23 MS. GINAPP: Objection. Form.
 24 BY MR. GUTIERREZ:
 25 Q How did it come about? What did they say?

1 "Hey, Jeramy, we want you to travel to Florida and take
 2 this rehab"?
 3 MS. GINAPP: Objection. Form.
 4 BY MR. GUTIERREZ:
 5 Q You can answer.
 6 A I don't understand what that means.
 7 Q So what that means -- let me just be clear.
 8 When counsel objects to my question, it's for the
 9 transcript so that when we go to court later, we can
 10 discuss whether it was a proper question before the
 11 judge. So when you get a booklet to read, my questions
 12 and your answers afterwards, there will be an
 13 objection, that we can argue on later. But we still
 14 expect you to answer the question.
 15 A Gotcha.
 16 Q So unless someone tells you not to answer, we
 17 still expect you to answer the question. Both of us
 18 will have objections to each other's questions as this
 19 deposition goes on. It's just for the court record.
 20 A Gotcha.
 21 Q So I'll ask the question again.
 22 What were the circumstances around the Joneses
 23 sending you to this rehabilitation facility in Florida?
 24 MS. GINAPP: Same objection.
 25 THE WITNESS: They ultimately said I had to go

<p style="text-align: right;">Page 13</p> <p>1 there or I was fired. And until it got into the</p> <p>2 brainwashing type stuff, I was fine with it.</p> <p>3 BY MR. GUTIERREZ:</p> <p>4 Q Okay. What does that mean?</p> <p>5 A So there's a thing in Scientology called</p> <p>6 objectives. And what that means is taking commands.</p> <p>7 So you'll spend eight hours a day in a room this size</p> <p>8 where a person will tell you to stand up, thank you,</p> <p>9 and then sit down, thank you, and then stand up, thank</p> <p>10 you, sit down, thank you. And the next day will be</p> <p>11 putting your nose in a corner. Then the next day will</p> <p>12 be touching a table. Don't touch a table. Thank you.</p> <p>13 Now touch a table. Don't touch a table. Thank you.</p> <p>14 Then the next day will be touching a wall. Then don't</p> <p>15 touch the wall. Then touch the wall. Then don't touch</p> <p>16 the wall. The purpose of it is -- I don't really</p> <p>17 know -- but it seemed like a whole bunch of</p> <p>18 brainwashing to me, and I couldn't vibe with it</p> <p>19 anymore. I couldn't do it.</p> <p>20 Q Did you voice this objection to the Joneses?</p> <p>21 A They wouldn't be heard. So I left.</p> <p>22 Q You left what?</p> <p>23 A The rehabilitation facility in Florida.</p> <p>24 Q Did that ultimately lead to you leaving the</p> <p>25 company?</p>	<p style="text-align: right;">Page 15</p> <p>1 is Nevada Beverage, Budweiser. After my tenure there,</p> <p>2 they had the entire network of Southern California that</p> <p>3 I closed myself. So when you have statistics like that</p> <p>4 to go from distribution for conventional channels of 2</p> <p>5 million people in Las Vegas -- and there seven years --</p> <p>6 to fast forward two years, now you have direct</p> <p>7 distribution to 20 million people -- it's pretty hard</p> <p>8 to find a valid reason to fire somebody. But from my</p> <p>9 experience in politics, I keep eyes and ears</p> <p>10 everywhere. And so I got intel that Aimee was telling</p> <p>11 people in the company that I was already gone prior to</p> <p>12 having them having a reason to fire me.</p> <p>13 BY MR. GUTIERREZ:</p> <p>14 Q What was Aimee telling people?</p> <p>15 A That I was no longer working with the company.</p> <p>16 Q This was before you had completed this</p> <p>17 rehabilitation that they sent you to?</p> <p>18 A No. This was after I left.</p> <p>19 Q Okay. So you believe, as you sit here today,</p> <p>20 that you would have been fired or set up to be fired</p> <p>21 for some alternative reason?</p> <p>22 A Absolutely.</p> <p>23 MS. GINAPP: Objection. Form. Foundation.</p> <p>24 BY MR. GUTIERREZ:</p> <p>25 Q Do you believe that based on your experience</p>
<p style="text-align: right;">Page 14</p> <p>1 A Yeah.</p> <p>2 Q Were you officially terminated, or did you</p> <p>3 quit?</p> <p>4 A No, I officially quit.</p> <p>5 Q Okay. You just felt that you could not return</p> <p>6 to that work environment based upon the Joneses'</p> <p>7 actions with you, or interactions with you?</p> <p>8 MS. GINAPP: Objection. Form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. GUTIERREZ:</p> <p>11 Q Did you feel, based upon you not completing</p> <p>12 this rehabilitation which was religious based, that you</p> <p>13 could not work in Real Water anymore?</p> <p>14 MS. GINAPP: Objection. Form. Misstates</p> <p>15 testimony.</p> <p>16 THE WITNESS: Yes. I knew that if I didn't</p> <p>17 finish it, I would be fired for one reason or another.</p> <p>18 BY MR. GUTIERREZ:</p> <p>19 Q Explain that. So do you feel that the Joneses</p> <p>20 would be come up with some sort of alternative reason</p> <p>21 to fire you?</p> <p>22 MS. GINAPP: Objection. Form. Foundation.</p> <p>23 THE WITNESS: They would have tried. When I</p> <p>24 started with Real Water, they had one direct sales</p> <p>25 distribution distributor, which is here in Las Vegas,</p>	<p style="text-align: right;">Page 16</p> <p>1 at Real Water and watching them do that to other</p> <p>2 people?</p> <p>3 MS. GINAPP: Same objection.</p> <p>4 THE WITNESS: It depends. I mean, I've seen</p> <p>5 people be terminated for being fat. I've seen people</p> <p>6 be terminated for other reasons. There really</p> <p>7 aren't -- so there's two different types of</p> <p>8 Scientology; right? There's what's called</p> <p>9 Administrative Tech, which is basically business study</p> <p>10 that's written by the same guy that wrote all the stuff</p> <p>11 for Scientology, L. Ron Hubbard, that is non-secular.</p> <p>12 And then there is religious stuff.</p> <p>13 And I did Scientology in June for a period of</p> <p>14 time, and I still couldn't find the religion in it.</p> <p>15 I'm a Christian. And I still couldn't find the</p> <p>16 religion in it. But maybe for purposes of their</p> <p>17 charity to maintain a tax exempt status, they call it a</p> <p>18 religion, but I really couldn't even find the religion</p> <p>19 in the religious stuff that you did.</p> <p>20 But at Real Water, we would use Administrative</p> <p>21 Tech, which is non-secular. Basically people would</p> <p>22 come to us -- we would hire people from Hope for</p> <p>23 Prisoners that couldn't read, didn't know how to learn.</p> <p>24 And so we would have them do the basic study text. The</p> <p>25 Basic Study Manual really teaches people how to learn</p>

1 and how to read, but really isn't religious. So I
 2 don't know very many people that worked there that did
 3 the religious stuff. I mean, we had a Purif on site,
 4 but there really aren't that many people that even
 5 participated in that.
 6 BY MR. GUTIERREZ:
 7 Q I'm sorry. What was that? A Purif?
 8 A Yeah. A Purif is -- the first step in
 9 Scientology is to get all the toxins out of your body.
 10 So you go into a sauna. The part that I completed at
 11 the rehab that I found to be advantageous was to -- you
 12 take certain oils and supplements, and run for half
 13 hour every day, and then go sit in a sauna for four and
 14 a half hours and sweat out all the toxins, residual
 15 toxins in the fat of your cells, and get all of the
 16 toxins out of the your body. It's like the first step
 17 of Scientology. It's called the Purif. But, I mean,
 18 there was one gal that did that and quit. But she
 19 wasn't terminated.
 20 Q You said you did a Purif on site at
 21 Real Water?
 22 A They have a sauna, yeah.
 23 Q Is the purpose of the sauna to go through this
 24 process that you just described that's called the
 25 Purif?

1 A Yeah.
 2 Q It was accessible for various employees who
 3 wanted do that, to go through this process on site at
 4 Real Water; is that correct?
 5 A Yeah, as an elective thing. That was not a
 6 required thing.
 7 Q At some point, did Real Water start moving
 8 some of the elective materials into mandatory
 9 materials?
 10 MS. GINAPP: Objection. Form.
 11 THE WITNESS: Absolutely, yeah. Not the
 12 religious stuff. Again, there's a difference --
 13 according to them, there's a difference between -- and
 14 I do see some difference between the Administrative
 15 Tech and the secular stuff. Again, I still don't know
 16 where the God is in all of this stuff, making it
 17 religious. But the Admin Tech was mandatory for
 18 everybody.
 19 BY MR. GUTIERREZ:
 20 Q Okay. But the optional courses that you
 21 received a 25-cent-an-hour raise by taking were
 22 optional?
 23 A Yes -- no, no, those are mandatory for
 24 everybody. Everybody has to do those.
 25 Q Okay. Let me back up. I probably have the

1 wrong understanding as to what was mandatory. So
 2 you're saying the courses where you take and get a
 3 25-cent-an-hour raise were mandatory as well?
 4 A Yes.
 5 Q Who made those mandatory?
 6 A Aimee Jones.
 7 Q In what way did she make those mandatory?
 8 A They were mandatory, man.
 9 MR. GUTIERREZ: Let me give you some
 10 documents, that will help you look through some of the
 11 Real Water material for what they've disclosed in this
 12 case as potentially --
 13 Let's attach this as Exhibit 7. I'll go
 14 through in order and back up.
 15 (Exhibit 7 marked)
 16 BY MR. GUTIERREZ:
 17 Q Jeramy, what I've attached as Exhibit 7 is a
 18 Real Water Course Memo that has been disclosed in this
 19 case. Have you seen this document before?
 20 A Yeah.
 21 Q Now, is this document a list of courses that
 22 Real Water gives that you're saying is actually
 23 mandatory?
 24 A Yeah.
 25 Q Okay.

1 A But nobody really does it. I mean, it is
 2 mandatory. What most people get through is Basic Study
 3 Manual, which is what I was telling you about, that
 4 just teaches you really how to read. It's like a
 5 cartoon book. For those that have an education above
 6 the third grade, it's kind of offensive.
 7 "Speaking From Experience," it's kind of the
 8 same. "How to Increase Efficiency in Your Company," is
 9 good. "Formula for Success" is good. The
 10 communication course is good. "Ups and Downs" is good.
 11 "Management by Statistics," everyone has to operate off
 12 of.
 13 So not everybody does these, but it is
 14 mandatory.
 15 Q What are the consequences of not doing these?
 16 A Getting yelled at.
 17 Q Anything else?
 18 A It's a constantly overturning wheel. One of
 19 the biggest arguments -- one of the things we did was
 20 throw fights. And the biggest argument that we had
 21 from Sam's Town and the Silverton was that no one ever
 22 stayed there for any period of time. So it's a
 23 revolving wheel of employees. Besides Anthony
 24 Randolph, I believe there was no one there that's been
 25 there for as long as I had been there.

<p style="text-align: right;">Page 21</p> <p>1 Q At Real Water?</p> <p>2 A Correct, other than Blain Jones. Blain Jones</p> <p>3 is a majority stockholder.</p> <p>4 Q And he's Brent's son?</p> <p>5 A He's Brent's oldest son.</p> <p>6 Q So one of the conversations you had at Real</p> <p>7 Water was the fact that there is a revolving wheel of</p> <p>8 employees; correct?</p> <p>9 A Yeah.</p> <p>10 Q What was the reason for that?</p> <p>11 A I think pay, lack of education, better</p> <p>12 opportunities elsewhere.</p> <p>13 Q Do you think any of the Scientology material,</p> <p>14 whether it was secular or non-secular, had a factor in</p> <p>15 some of the employees not wanting to stay there?</p> <p>16 MS. GINAPP: Objection. Form. Foundation.</p> <p>17 THE WITNESS: People have said that. More</p> <p>18 people have said it was the craziness that has gone on</p> <p>19 between Brent and Aimee screaming in the office, and</p> <p>20 things like that.</p> <p>21 BY MR. GUTIERREZ:</p> <p>22 Q Is that screaming based upon -- you talked</p> <p>23 about it earlier -- people not doing these mandatory</p> <p>24 courses on the Real Water Course Memo?</p> <p>25 A No --</p>	<p style="text-align: right;">Page 23</p> <p>1 Basic Study Manual, "Speaking From Experience," and</p> <p>2 statistics.</p> <p>3 Q Okay. Now --</p> <p>4 A I mean, in all sincerity, besides Brent and</p> <p>5 Aimee or Blain, I don't know anybody who has done all</p> <p>6 18 courses. I didn't. I did Basic Study Manual,</p> <p>7 "Speaking From Experience." The last course I was on</p> <p>8 was "Formula for Success." But I did "Ups and Downs"</p> <p>9 through the Church of Scientology, and "Personal Values</p> <p>10 and Integrity" through the church of Scientology.</p> <p>11 Q Brent Jones, Blain Jones, and Aimee Jones have</p> <p>12 all been deposed in this case. They've all testified</p> <p>13 that these courses are optional. Is that accurate?</p> <p>14 A No.</p> <p>15 Q Would the company treat employees differently</p> <p>16 who did not take these courses?</p> <p>17 MS. GINAPP: Objection. Form. Foundation.</p> <p>18 THE WITNESS: Yeah. You'd get a round of</p> <p>19 applause if you finished your coursework. Brent and</p> <p>20 Aimee don't commonly have, at least in my experience,</p> <p>21 hands-on experience with the employees. They have</p> <p>22 hands-on experience with employee heads.</p> <p>23 I didn't give a crap if somebody had done</p> <p>24 their coursework or not. I care if somebody is an</p> <p>25 effective employee, because that affects my statistics</p>
<p style="text-align: right;">Page 22</p> <p>1 MS. GINAPP: Objection. Form. Foundation.</p> <p>2 THE WITNESS: No, no, that's just their deal.</p> <p>3 BY MR. GUTIERREZ:</p> <p>4 Q Okay. That's how they run the company? Okay.</p> <p>5 Now, this Real Water Course Memo has 18</p> <p>6 different courses on it. You're familiar with all 18;</p> <p>7 is that correct?</p> <p>8 A I have not done all 18, no. I have done "Ups</p> <p>9 and Downs," PV and I, which is "Personal Values and</p> <p>10 Integrity." I've done portions of "Management by</p> <p>11 Statistics" enough to use it.</p> <p>12 So we have what are called statistics that are</p> <p>13 due every Monday that -- I think most corporations use</p> <p>14 one form of statistics or another. It's just a way to</p> <p>15 judge and gauge how effective each department has been.</p> <p>16 So every department head is required to do -- to turn</p> <p>17 in statistics every week. Every employee is required</p> <p>18 to turn in their statistics. So, for example, my</p> <p>19 salespeople would have to notate, Monday through</p> <p>20 Friday, I hit "X" amount of community stores, liquor</p> <p>21 stores, health food stores, I sold "X" amount; I sold</p> <p>22 "X" amount of cases, and then turn it in. So everyone</p> <p>23 has to have at least some grasp of how to use</p> <p>24 statistics in order to be employed there.</p> <p>25 Most employees that stay there finish the</p>	<p style="text-align: right;">Page 24</p> <p>1 and whether I'm in a good or a bad zone in my</p> <p>2 statistics.</p> <p>3 And I was the person that would deal the</p> <p>4 employees, whether they were merchandisers, demo girls,</p> <p>5 salespeople. And so most salespeople don't have a lot</p> <p>6 of interaction with ownership. They deal with the</p> <p>7 buffer between ownership and the front lines, which</p> <p>8 would be myself and my junior, Ryan Moodley, that I</p> <p>9 would delegate really to have him deal with people more</p> <p>10 so I could focus on expansion.</p> <p>11 BY MR. GUTIERREZ:</p> <p>12 Q Who else would be considered an employee head</p> <p>13 that would have the supervisory capacity that would</p> <p>14 report to Brent or Aimee?</p> <p>15 A At this point, I don't know what Anthony</p> <p>16 Randolph's role is. He was my boss prior to me</p> <p>17 replacing him, and him moving over to more like a</p> <p>18 broker role. Prior to my tenure, I don't know. I know</p> <p>19 that Frank -- and I don't know Frank's last name -- has</p> <p>20 assumed my position.</p> <p>21 Q Is it Consiglio?</p> <p>22 A Something like that, yeah.</p> <p>23 Q What about Bonnie Mercado, did she have any</p> <p>24 supervisory capacity?</p> <p>25 MS. GINAPP: Objection. Form.</p>

1 THE WITNESS: Sort of. She was like my lead
2 demo girl. Bonnie is a fricking superstar, just a ton
3 of enthusiasm, and was like the lead demo person for a
4 period. Now she's in a different department. But she
5 was the lead demo/merchandiser girl that would go on
6 trips for me, and then also merchandise the stores here
7 in Las Vegas.

8 BY MR. GUTIERREZ:

9 Q Okay. Now, these optional courses -- or
10 they're labeled as optional, you testified that they're
11 mandatory. If somebody does not take it, they do not
12 get any raises; is that correct?

13 A Correct.

14 Q That's even a discretionary raise? If someone
15 has not taken these courses, they're not even going to
16 get a discretionary raise outside of this
17 25-cent-an-hour raise; correct?

18 MS. GINAPP: Objection. Form. Foundation.

19 THE WITNESS: I think it depends. Like, my
20 biggest motivation to leave Real Water wasn't because
21 of the Administrative Tech. And a lot of this stuff
22 teaches you some common sense stuff. Even "Ups and
23 Down," and "Personal Value and Integrity," which these
24 may not be Dif 6 courses, I did the Dif 6 course not
25 the -- I don't know what versions of "Ups and Downs"

1 and "Personal Values and Integrity" these are. In
2 Narconon, they also did "Ups and Downs" and "Personal
3 Value and Integrity," and it wasn't Dif 6.

4 Dif 6 is the religious version of this book.
5 These may be the admin version, I don't know,
6 through -- not WISE, but through -- I can't think of
7 the name. They are separate corporations for the
8 Church of Scientology. So one is secular, one is
9 non-secular. So these courses may have the same name,
10 but may be a different version of the same course.
11 Maybe the name will come to me.

12 But, I mean, I got a lot out of them
13 personally. But the reason I left was -- I mean, I had
14 threatened to leave before, and Brent offered me more
15 money to stay because I have a very unique skill set
16 for closing multi-million-dollar deals. And it doesn't
17 make sense to me to just settle for craziness if I can
18 have a simpler life and make more money elsewhere.

19 But I believe in -- I also had a stock option
20 agreement. If I would have lasted another year, I
21 would have had 150,000 shares, which on an IPO would
22 turn into a lot of money. But I ultimately believe
23 that the IPO would never come, because things aren't
24 done the right way. You have to put money in
25 marketing. You have to -- there are just things that

1 you have to do, man, to get enough market share to have
2 a decent evaluation and IPO.

3 MS. GINAPP: I'm going to object to this
4 testimony as it's not responsive to any question.

5 BY MR. GUTIERREZ:

6 Q You can finish. Go ahead.

7 A So that's the reason I left, not because of
8 Scientology, was that I wanted to make more money
9 elsewhere.

10 Q Okay. Had you gone to one of these
11 rehabilitation facilities before you went there in
12 December?

13 A No.

14 Q Had anyone else at Real Water, that you know
15 of, gone to one of those rehabilitation facilities?

16 A To Narconon?

17 Q Yeah.

18 A I don't know if Blain did or not. I don't
19 know.

20 Q How many days were you there?

21 A November 20th to December 24th -- no. I left
22 the night of the 23rd, and arrived back in Vegas on the
23 24th. So, a month and a couple days.

24 Q Where was it located at?

25 A In -- I have the exact address -- in

1 Clearwater, very close to what's called Flag, which is
2 the Scientology mecca of the country. 1390 Sunset
3 Point Road in Clearwater, Florida 33755.

4 Q Now, Narconon, is that through the Church of
5 Scientology, as far as its rehabilitation facility?

6 A It is Scientology, period. The first things
7 you do in Scientology is do a Purif, do your "Ups and
8 Down" course, do "Personal Values and Integrity," do
9 objectives, and do ethics. It is exactly as any new
10 start of Scientology would go through.

11 In fact, the reason that Narconon has such a
12 bad name -- if you go online, it looks horrific -- and
13 the reason that some people drop out of it is because
14 it's not presented as Scientology, and then once you
15 get into it, all they do is talk L. Ron Hubbard the
16 entire time. And then once you get into the meat of
17 it, it's founded on the principles of L. Ron Hubbard.
18 It's Scientology, man.

19 Q How is that different from some of the tech
20 materials that are L. Ron Hubbard based that Real Water
21 claims is secular?

22 MS. GINAPP: Objection. Form foundation.

23 THE WITNESS: Business. So the Basic Study
24 Manual, "Speaking from Experience," "How to Increase
25 Efficiency in Your Company," "Formula for Success,"

1 "Improving Business through Communication," "Executive
2 Basics" -- these are all things of how to run your
3 business. "Ups and Downs" is something we did at
4 Narconon. "Personal Values and Integrity" is something
5 we did at Narconon. "Statistics" is something you did
6 at Narconon. I mean, the difference is one is for
7 business, and one is for yourself.

8 MR. GUTIERREZ: Okay. I want to attach this
9 as Exhibit 14.

10 (Exhibit 14 marked)

11 BY MR. GUTIERREZ:

12 Q Jeramy, is this a copy of the Basic Study
13 Manual that you've reviewed?

14 A Uh-huh.

15 Q That's a "yes"?

16 A Oh, I'm sorry. Yes.

17 Q Okay. This is part of their, quote, optional,
18 unquote, course that you just testified that were
19 mandatory. But this is supposed to be purely secular
20 in nature; is that correct?

21 A I have a misunderstood on the word "secular."
22 I think this means it's non-secular, or it's -- that's
23 just a different word. This is supposed to mean
24 non-religious. I think that this particular course is
25 non-religious.

1 Q Okay. And that's what I meant. So
2 non-religious, it's supposed to be non-religious, and
3 just a business base?

4 A This version is not the version that we used
5 at the office. We used a book. So I'm not familiar
6 with this book.

7 Q This version right here has -- if you skip to
8 the back -- and I want to call your attention to these
9 numbers at the lower right-hand corner which are called
10 Bates numbers where you see "RW."

11 A Yeah.

12 Q If you go to RW-265 --

13 A Okay.

14 Q -- it has a list of Scientology Churches and
15 Organizations, where somebody who was looking at this
16 could presumably inquire more into Scientology as a
17 religion. Do you see that?

18 A Uh-huh.

19 Q That's a "yes"?

20 A Oh, I'm sorry. Yes.

21 Q Okay.

22 MS. GINAPP: I'm going to lodge a continuing
23 objection to this exhibit based upon it being
24 incomplete.

25 /////

1 BY MR. GUTIERREZ:

2 Q Go to page 249 as well.

3 A Okay.

4 Q The second paragraph of this end note states
5 that, quote, "There is a further Scientology service
6 available which you should now do which is designed to
7 bring you greater success and happiness in your work,
8 your social life, your relationships with others, or
9 any aspect of your life," unquote.

10 Have you seen that before?

11 A Like I was saying, this is a different version
12 than what we used. I've never seen this Basic Study
13 Manual Course, of this version. We had books, and I
14 was given on a zip drive to give to employees that were
15 not in the city of Las Vegas and on the road to do this
16 course. And that version looks different than this.
17 I've never seen this course.

18 Q This was produced by Real Water. So this is
19 the version that they gave to us when we requested
20 documents.

21 A Okay.

22 Q I don't know if there's another version out
23 there. But this is what we've been referring to in the
24 course of this litigation.

25 A Okay.

1 Q But based on your experience at Real Water, in
2 looking at something like this, wouldn't you agree that
3 this is almost promoting or introducing somebody to
4 Scientology as a religion?

5 MS. GINAPP: Objection. Form. Foundation.

6 THE WITNESS: "The Way to Happiness" is the
7 Scientology moral code. And I can't tell you the
8 number of employees I had to sit and monitor and make
9 sure that they watched it.

10 BY MR. GUTIERREZ:

11 Q "The Way to Happiness" is one of the four
12 videos that's mandatory when an employee starts at
13 Real Water; correct?

14 A Yeah.

15 Q And that's been referred to as the "Gateway to
16 Scientology"; is that correct?

17 MS. GINAPP: Objection. Form. Foundation.

18 THE WITNESS: Sort of. It's like -- it's a
19 moral code. So, Christianity has the Ten Commandments.
20 Scientology has "The Way to Happiness." It's like more
21 commonsense ways to live your life. If you cheat on
22 your wife, you run the risk of getting a
23 sexually-transmitted disease and/or she would get
24 jealous and kill you, rather than God will strike you
25 down and you'll end up in hell. It's more like common

1 sense, pro-survival solutions to living life and being
 2 successful.
 3 BY MR. GUTIERREZ:
 4 Q Right, which -- to each their own, and anyone
 5 who has their own religious beliefs. But when it comes
 6 to the workplace and Title VII and freedom of religion,
 7 do you believe that Real Water was forcing their
 8 religious beliefs down their employees' throats by
 9 forcing them to watch these videos?
 10 MS. GINAPP: Objection. Form. Foundation.
 11 Calls for a legal opinion.
 12 THE WITNESS: Until you get into the higher
 13 levels of Scientology, it's pretty fluffy. I mean,
 14 it's pretty -- I mean, in my introduction to
 15 Scientology, they told me I could be a Christian and a
 16 Scientologist. That's absolutely not the case. But
 17 when I was being introduced to it, that's what I was
 18 told. And so by having people watch "The Way to
 19 Happiness," I don't think it would violate the Ten
 20 Commandments or violate any of their religious beliefs.
 21 The further you get into Scientology, yeah, absolutely.
 22 BY MR. GUTIERREZ:
 23 Q And that's --
 24 A But "The Way to Happiness" -- I mean, I didn't
 25 notice anybody get offended by "The Way to Happiness."

1 I got offended the number of times I had to watch it,
 2 you know, because it got so boring, but --
 3 Q That's sort of -- there's an overlap,
 4 obviously, if somebody has moral beliefs based on
 5 whatever their religion is. But like you stated, at
 6 some point as you get further into Scientology, it
 7 starts to veer and pull people more into that
 8 direction. Is that what you believe?
 9 A Yeah.
 10 MS. GINAPP: Objection. Form. Foundation.
 11 BY MR. GUTIERREZ:
 12 Q And these courses and the way they're set up
 13 are designed for that; isn't that correct?
 14 MS. GINAPP: Objection. Form. Foundation.
 15 THE WITNESS: Ultimately, yes. Like I stated,
 16 I hadn't done all of these courses, and was really more
 17 focused on expanding the company than getting
 18 coursework done. I felt that coursework was a waste of
 19 my time, and that I already had all the tools to expand
 20 the company. So having to do statistics every day
 21 slowed me down. Having to do coursework every day
 22 slowed my down. My gift was closing and expanding the
 23 marketplace.
 24 So I really -- I've seen this memo before,
 25 Exhibit No. 7, but I really hadn't given it -- it was

1 in a big stack on my desk of additional memos that I
 2 paid no mind to. I did as much coursework as I needed
 3 to get through the day, you know, to navigate through
 4 the company. But coursework really wasn't my priority.
 5 Expanding the company's empire was my priority. But it
 6 is interesting that "Ups and Downs" and "Personal
 7 Values and Integrity" is on here.
 8 BY MR. GUTIERREZ:
 9 Q Why is that?
 10 A Because those are straight-up Scientology
 11 courses.
 12 Q So there's nothing non-religious about those
 13 courses; correct?
 14 A That's true.
 15 Q They're strictly Scientology based? Okay.
 16 A I did them at the Mission in Orange County.
 17 Q What was the Mission in Orange County?
 18 A So you have different levels. So you have --
 19 like here in Vegas we have what's called an Org, which
 20 stands for an organization, which is a big church.
 21 Then you have like Flag in Florida, which is a massive
 22 church. Then you have Missions, which are like a
 23 smaller church. It's still the Church of Scientology,
 24 but it's -- you may only have one or two case
 25 supervisors, and a Mission. In an Org, you might have

1 a bigger number than that. At Flag, you'll have
 2 hundreds of case supervisors doing auditing and
 3 different drills. So a Mission is like a small church.
 4 And I did "Ups and Downs," "Personal Values and
 5 Integrity" -- a bunch of other courses that aren't on
 6 this list -- but I did "Ups and Downs" and "Personal
 7 Values and Integrity" at the Mission in Orange County,
 8 California.
 9 Q Did you do those as part of your employment
 10 with Real Water, or based on you looking into the
 11 Scientology religion?
 12 A Brent sat me down in June and told me that I
 13 needed to go do my Purif if I wanted to continue with
 14 the company. So at that same time, I was also -- I had
 15 just closed, or was in the process of closing Budweiser
 16 called Straub, which is the most profitable Budweiser
 17 in California, the Budweiser of Orange County, which is
 18 one of the most affluent parts of California.
 19 Q So Brent Jones sat you down in June 2016 and
 20 said your employment was contingent upon you going to
 21 do these Scientology courses?
 22 MS. GINAPP: Objection. Form.
 23 THE WITNESS: And doing a Purif.
 24 BY MR. GUTIERREZ:
 25 Q And a Purif?

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1 **A Yeah.**

2 **Q** And this is after this lawsuit had been filed;
3 is that correct?

4 **MS. GINAPP:** Objection. Form.

5 **THE WITNESS:** I don't know when the lawsuit
6 was filed.

7 **BY MR. GUTIERREZ:**

8 **Q** The lawsuit was filed in April of 2016, and
9 Mr. Jones --

10 **A** This would be June of 2016.

11 **Q** So right around the time he had his primary?

12 **A Yeah. I did disaster relief for -- you know,**
13 **once this hit the press, I had to do damage control,**
14 **and get our side of the story out. So I reached out to**
15 **my contacts at Channel 13 and got us some on-air time**
16 **right before the primary hit.**

17 **Q** Okay. What was that --

18 **A** Well, there was so much press about this
19 particular case. And I had to spin it some way. I had
20 to at least get our version of the story out. And not
21 all media gives you fair coverage, certainly. They'll
22 take one word and spin it -- I mean, if you change one
23 word in a sentence, it changes the whole meaning of the
24 sentence. And a lot of reporters are known for doing
25 this. As Brent Jones' Chief of Staff in Carson City, I

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1 learned which reporters I could trust, and which
2 reporters I couldn't trust, which ones would quote me
3 verbatim if they were writing an article in the
4 newspaper and going to quote me or quote the
5 Assemblyman. And so I had a relationship with Riley
6 Snyder of the Associated Press who is also a
7 correspondent at Channel 13 News, and so I reached out
8 to Riley because I knew that his team would give us
9 fair coverage and quote us verbatim.

10 **Q** What was the spin that the company put on this
11 case?

12 **A** That really -- so "spin" is a word that we
13 use. It doesn't necessarily mean change the truth. It
14 just means get your side of the story out. All the
15 news coverage up to that point was looking really bad.
16 And so I wanted to get Brent on air to get his version
17 of the story out in the media. Even though it wouldn't
18 get as much coverage as the negative stuff, I had to
19 get it out in the media so we could have our
20 constituents see that there's another side of the
21 story.

22 **Q** And what was Brent's position on air?

23 **A** I don't have it memorized. Just that it was
24 an attack from the Governor more so than anything of
25 substance. We opposed the Governor in his tax increase

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1 **openly. The Governor is kind of a powerful guy, and**
2 **kind of runs the state.**

3 **Q** They usually do.

4 **A** So we were the sharp end of the stick in
5 opposition to him. So we felt at that time that he was
6 using Grecia to make Brent look bad. So we wanted to
7 get our version of just that out, that it was a
8 political attack more than it was a -- the timing of it
9 is what we wanted to get out, that, why this story is
10 breaking right now a week before early voting is
11 starting rather than any other time.

12 **Q** Did Brent have any proof, or was he just
13 basing this on speculation to get some sort of
14 political spin on it?

15 **MS. GINAPP:** Objection. Form. Foundation.

16 **THE WITNESS:** I mean, getting proof on the
17 Governor is, like -- yeah, good luck with that, man.
18 So, no, it was all speculation.

19 **BY MR. GUTIERREZ:**

20 **Q** What about some of the attacks on Grecia that
21 came about in the media?

22 **MS. GINAPP:** Objection. Form. Foundation.

23 **BY MR. GUTIERREZ:**

24 **Q** Where did that come from?

25 **A** I ran human relations. We used a couple of

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1 different consultants to do different things for our
2 campaign. I wasn't responsible or involved with any of
3 the attack pieces. In some cases, I would green light
4 or red light a negative mailer or an attack piece,
5 because I do have some experience with negative
6 campaigning. But in the negative attacks on Grecia, I
7 wasn't involved in that.

8 **Q** Bonnie had reported to a news organization
9 about Grecia's prior health issues, prescription drug
10 use, and financial condition, which was publicly
11 reported. Who was behind that?

12 **MS. GINAPP:** Objection. Form.

13 **THE WITNESS:** We did do a mailer, but I don't
14 know who was -- in all sincerity, I don't know who was
15 behind the motivation for that.

16 **BY MR. GUTIERREZ:**

17 **Q** Did you have any conversations with Brent or
18 Aimee regarding Grecia's lawsuit at the time it was
19 filed?

20 **A** Just that they felt it was frivolous.

21 **Q** Anything else that they discussed about Grecia
22 specifically?

23 **A** I mean, I hired Grecia. I fired Grecia. She
24 got in a car accident which further inflamed -- if
25 that's the word you want to use -- some pre-existing

1 **medical conditions that she had. I think she had**
 2 **either Crohn's or colitis, and I think another**
 3 **condition, which it's my understanding is just**
 4 **intestinal stuff. I don't really know. And so it made**
 5 **it harder for her to actually work.**

6 **At one point in time, she couldn't lift -- the**
 7 **majority of her job is setting up -- is merchandising.**
 8 **And what merchandising means is that they create case**
 9 **stack displays in stores, grocery stores, end caps.**
 10 **And they have to build that themselves. And a case of**
 11 **water is like 30 pounds, 30 to 33 pounds, depending on**
 12 **the skew. Skew is a bar code.**

13 **And so there was a portion of time that she**
 14 **couldn't lift a case of water. So I was rather**
 15 **frustrated with her because she couldn't do her job**
 16 **duties. I understand there's medical restrictions, and**
 17 **whatnot, but I just want my statistics to look good. I**
 18 **just want my job to get done. Regardless of liking**
 19 **somebody or not, I just want the end result.**

20 Q So Grecia was doing her job at the time she
 21 worked for Real Water up until this car accident when
 22 she was injured? Is that fair to say?

23 A I think -- yeah, she was injured to some
 24 degree. To what degree, I don't really know. I know
 25 that those little Smart Cars are like lawnmowers with

1 **sides on them. So any accident you get into -- I'm not**
 2 **a doctor, but you're probably going to get pretty**
 3 **banged up.**

4 Q So you were the one who hired Grecia; is that
 5 correct?

6 A Uh-huh.

7 Q That's a "yes"?

8 A Yes.

9 Q When you hired her, did she have to go through
 10 the mandatory coursework as well?

11 A **She had to start. I don't think that she got**
 12 **past the Basic Study Manual. I didn't do a very good**
 13 **job of forcing people to do coursework because I wanted**
 14 **people out in the field being productive. Just like I**
 15 **didn't do a very good job of doing the coursework**
 16 **myself, because I wanted to work and be productive.**

17 Q Did -- first of all, who did you report to?
 18 Who were your supervisors?

19 A Brent Jones.

20 Q So did Brent ever talk to you about, "Hey,
 21 you're not doing a good enough job making sure people
 22 are doing their coursework, we need to stay on top of
 23 some of this"?

24 A Oh, yeah.

25 Q Your response was, "I want to run the company

1 and make sure we're productive, and we need employees
 2 out there"; correct?

3 A Yeah.

4 MR. GUTIERREZ: Let me back up real quick.

5 Let's start going through some of these exhibits.

6 Attach this as Exhibit 1.

7 (Exhibit 1 marked)

8 BY MR. GUTIERREZ:

9 Q Jeramy, this is a copy of the subpoena that we
 10 sent to you to compel your appearance here today. Have
 11 you seen this document?

12 A Yeah. I was served it.

13 Q You were served, and you are here today based
 14 upon that subpoena; is that correct?

15 A Yeah.

16 Q Okay. Other than coordinating dates of this
 17 deposition, did you have any conversations with our
 18 office regarding your testimony today or the case?

19 A No.

20 Q Okay.

21 A **I've been contacted by your law firm and by**
 22 **Real Water's law firm, and haven't taken anybody's**
 23 **phone calls. I have texted David Gardner about this**
 24 **all being bullshit that I have to spend my time dealing**
 25 **with this. And that's the extent of attorneys I've**

1 **communicated with.**

2 Q Fair enough. Okay.

3 Did you review any documents to prepare for
 4 your deposition today?

5 A **No. I woke up, took a shower, had a cup of**
 6 **coffee, and got here.**

7 MR. GUTIERREZ: All right. This is Exhibit 2.

8 (Exhibit 2 marked)

9 THE WITNESS: After consulting an attorney
 10 friend of mine and a couple members of law enforcement,
 11 they told me that regardless of what paperwork I've
 12 signed with Real Water and my quitting paperwork, that
 13 I should just come here and tell the truth.

14 BY MR. GUTIERREZ:

15 Q And that's what you're doing today? You're
 16 telling the truth; correct?

17 A **I'm just telling you how it is.**

18 Q Okay.

19 A **It's going to create an enemy of**
 20 **Assemblyman -- or -- former Assemblyman Brent Jones**
 21 **that I like as a human being. But the truth is the**
 22 **truth.**

23 Q Why do you believe it would create an enemy?

24 A **Because it just will, man.**

25 Q If telling the truth was beneficial to Brent

1 Jones, why would it create an enemy?
 2 MS. GINAPP: Objection. Form. Foundation.
 3 THE WITNESS: It's going to cost him a lot of
 4 money.
 5 BY MR. GUTIERREZ:
 6 Q Why is that?
 7 A Because I was personally forced to do
 8 Scientology, and contingent upon my job. I'm not suing
 9 Real Water. I'm not getting involved in that. I'm not
 10 going to spend my energy in lawsuits and things that I
 11 consider to be negative energy when I can spend my
 12 energy closing multi-million-dollar deals making money,
 13 that's positive. But Grecia is.
 14 And I was absolutely forced to do Scientology.
 15 That was a part of my job. I'm not saying that she was
 16 necessarily, or that any other employees were. But in
 17 any mind, I think that my testimony is going to be bad
 18 for them, but -- and he will think that makes me
 19 vindictive, or whatever, and I don't have those
 20 negatives feelings. Otherwise, I would be suing him
 21 directly.
 22 Q Okay. So you're here today in response to a
 23 subpoena, and you're telling the truth about your
 24 experience at Real Water? That's correct?
 25 A Yes.

1 Q Exhibit 2 that I've handed you is Grecia's
 2 intake paperwork with Real Water. It's dated March
 3 11th, 2015? Do you see that?
 4 A Yeah.
 5 Q Page 2 lists you as her manager. Do you see
 6 that?
 7 A Yeah.
 8 Q And that's correct; right?
 9 A Yeah. And it's even spelled right.
 10 Q Okay. When you give an employee this type of
 11 intake, describe how that process goes for hiring.
 12 A So at this point, we had a really competent
 13 gal running human resources, Melissa. I don't remember
 14 her last name. So really, I just drop them off with
 15 human resources, make sure the front desk -- which at
 16 that time was Mimi -- had copies of all the DVDs they
 17 had to watch -- "The Way to Happiness," "Letter to
 18 Garcia," a video we'd pull off of YouTube called "Just
 19 Do It," and then the "Culture" videos which are videos
 20 that Brent made himself that just go over the type of
 21 culture that it is there.
 22 And so I would just hand -- I would get this
 23 packet from HR, and then pretty much just hand it to
 24 them and say, "This is pretty common sense, fill it
 25 out. If you have questions on the tax paperwork, come

1 see me. Otherwise, it's pretty self-explanatory
 2 stuff." I mean, as far as, like, direct deposit forms
 3 and stuff like that, that's beyond my skill.
 4 MR. GUTIERREZ: Okay. Attach this as
 5 Exhibit 3.
 6 (Exhibit 3 marked)
 7 BY MR. GUTIERREZ:
 8 Q This Employment Agreement, which we've
 9 attached as Exhibit 3, is this also part of the intake
 10 paperwork for each employee?
 11 A There's a ton of paperwork, but I believe so.
 12 Q Now, do you know the purpose of this
 13 Employment Agreement?
 14 MS. GINAPP: Objection. Foundation.
 15 THE WITNESS: Not really. I mean, I'm one of
 16 those people that actually do read everything you sign.
 17 But I don't know what -- I can't pretend to know what
 18 they created this form for.
 19 BY MR. GUTIERREZ:
 20 Q Look at Section 3 at the bottom of the page.
 21 A Okay.
 22 Q It's entitled, "L. Ron Hubbard." It discusses
 23 use of L. Ron Hubbard's Management Technology in
 24 operating the company, but states that the employee is
 25 acknowledging that the use of the material for

1 Mr. Hubbard is separate and distinct from any religious
 2 aspects of Scientology. Do you see that?
 3 A Yeah.
 4 Q Now, employees are effectively forced to sign
 5 off on that; is that correct?
 6 A If you want to get a job.
 7 Q So if they don't sign that, they don't get a
 8 job; correct?
 9 A Yeah. But you got to think about how eager
 10 people are when you're looking to get a new job, man,
 11 you'll sign about anything.
 12 Q And that's the unfortunate part of why these
 13 cases, when they go forward -- and that's why we have
 14 Title VII. So we're looking at this -- you're forced
 15 effectively, if you don't sign this, you're not
 16 working; correct?
 17 MS. GINAPP: Objection. Form. Foundation.
 18 THE WITNESS: In my experience, yeah. I mean,
 19 I've never had a new hire that wasn't willing to sign
 20 this Employment Agreement. But I know when I was
 21 handed it, I went out of the HR room and sat down in
 22 the front office and read every single line myself.
 23 Most people just sign, sign, sign, and don't even --
 24 they just want to go to work.
 25 /////

1 BY MR. GUTIERREZ:

2 Q When somebody is signing this Employment
3 Agreement, is this before they even had the opportunity
4 to review the mandatory videos?

5 MS. GINAPP: Objection. Form. Foundation.

6 THE WITNESS: This is before you watch the
7 videos, yeah.

8 BY MR. GUTIERREZ:

9 Q So the employee doesn't even have the
10 opportunity to see exactly what they're being forced to
11 watch as part of their employment; correct?

12 MS. GINAPP: Objection. Form.

13 THE WITNESS: Yeah, but the videos aren't --
14 they're not the crazy brainwashing I was talking to you
15 about earlier. They're not the higher levels of
16 Scientology at all. They're pretty fluff.

17 BY MR. GUTIERREZ:

18 Q But when it comes to giving the employee a
19 full opportunity to review what they're signing, does
20 the employee get an opportunity to take this document
21 home, or consult an attorney, or it's, "Hey, you're
22 hired, sit in that room and fill all this out"?

23 MS. GINAPP: Objection. Foundation.

24 THE WITNESS: I've sent people home with the
25 paperwork. You got to think of the scope of people

1 that we would hire. They're not people that have
2 attorneys commonly, so not one on retainer. You may
3 have a friend. When I sat down and read every single
4 line, Melissa commented that I was the first person
5 ever to sit down and read every single line. But
6 coming from a background in politics -- my dad was a
7 labor boss -- I'm a rather skeptical human being -- I
8 wanted to make sure that everything I was going to sign
9 my name to, I understood.

10 BY MR. GUTIERREZ:

11 Q Okay. Turn to the third page of this,
12 Section 8.

13 A Section 8, okay.

14 Q This is entitled, "Freedom of Religion." Have
15 you seen this section before?

16 A Yeah.

17 Q What was the purpose of this explanation?

18 MS. GINAPP: Objection. Form. Foundation.

19 THE WITNESS: I didn't write the document, so
20 I don't really know. It sounds like -- I mean, it's
21 kind of funny, but --

22 BY MR. GUTIERREZ:

23 Q Why is that?

24 A Because you're signing off that your freedom
25 of religion amendment is not going to be violated right

1 before you are going to watch some Scientology videos

2 Q Now, on this next page of this document,
3 that's your signature; correct?

4 A It doesn't look like a signature, but it is my
5 signature.

6 Q Okay.

7 A And the reason I write my name out is because
8 I was a rocker in my youth, so my autograph became
9 that, and you can't read what it is. So I write my
10 name out next to my signature because no one can tell
11 what it is.

12 Q Makes sense. So that's definitely you, you
13 acknowledge that Grecia signed that?

14 A That's me.

15 Q In your position at Real Water, had Grecia not
16 initialed every single page, would you have been able
17 to sign off on this?

18 A No.

19 Q So as a condition of her employment, she would
20 have to sign off on this, and initial every single
21 page; correct?

22 A Yes.

23 Q The same with the Employment Agreement, which
24 is on the next page of this. This looks like a
25 separate Employment Agreement, but it's approximately

1 nine pages. Your signature looks to be at the very
2 end. Do you see that?

3 A Yeah. Same thing. My signature, and then
4 printed out because you can't read that it is an actual
5 signature, but it is.

6 Q Again, if Grecia would not have initialed
7 every single section of this Employment Agreement or
8 signed off at the end, you would not have signed off as
9 a witness; correct?

10 A Correct.

11 Q Okay.

12 MS. GINAPP: Can we take a quick break?

13 MR. GUTIERREZ: Yes.

14 (Recess taken from 11:15 a.m. to 11:22 a.m.)

15 MR. GUTIERREZ: We can go back on the record.
16 (Exhibits 4-6 marked)

17 BY MR. GUTIERREZ:

18 Q Jeramy, what I've handed you as Exhibit 4 is
19 Grecia's video review of "Message to Garcia."
20 Exhibit 5 is her review of "The Secret." And Exhibit 6
21 is her video review of "The Way to Happiness."

22 Tell me about these specific reviews in
23 general. Are they mandatory for employees to fill out
24 following their reviewing the videos?

25 A Yes.

1 Q What happens if an employee does not fill
2 these out?
3 A I never had an employee not fill them out. So
4 I don't really know.
5 Q Now, in your experience in reviewing these
6 videos in Scientology, which of these, if any, are
7 based on Scientology religion?
8 A "The Secret" certainly isn't. "The Secret" is
9 a popular book that Oprah put as one of her favorite
10 books, or whatever.
11 Q Okay.
12 A "Message to Garcia" is a portion from -- of
13 the ethics book, which is not in the coursework.
14 Q Okay.
15 A And "The Way to Happiness" is the
16 non-religious moral code that Scientology is based
17 around.
18 Q Okay.
19 A Why they make that distinction, in Narconon
20 Center that is non-religious -- quote, unquote -- we
21 had to watch the same video that I forced a million
22 employees to watch. And so I asked Mike Hoyt, one of
23 the staff members there who was an OT8 -- that's as
24 high as you can go in the Church of Scientology -- why
25 we were watching this, and he explained to me how it's

1 not religious. But I did not think that was the case.
2 So "The Secret" is not Scientology at all.
3 That's just like self-actualization stuff. "The Way to
4 Happiness" is the moral code. And "Message to Garcia"
5 is kind of a story about persistence. The only place
6 I've ever found it is in the ethics book. But it's not
7 in any of the other courses that I did, which was --
8 where is that now?
9 Q You're looking at Exhibit 7, the Real Water
10 Course Memo; correct?
11 A Correct. It's not in, to my understanding,
12 any of these 18 courses.
13 Q Which one, "The Way to Happiness"?
14 A No, "Message to Garcia." That's pulled from
15 the ethics book.
16 Q Okay. But "The Way to Happiness," based on
17 your experience and based on what you've been told from
18 people in Scientology, is a Scientology-based book?
19 A It's the moral code. It's like the Ten
20 Commandments of Christianity.
21 Q Now, Narconon, when you went there, did
22 Real Water pay for you that, or did you pay for that on
23 your own?
24 A That's a complicated answer. Ultimately, it
25 ended up that Real Water paid for it.

1 Q You were forced to watch "The Way to
2 Happiness" at this rehabilitation center?
3 A Uh-huh.
4 Q That's a "yes"?
5 A Yes. Somehow it's State approved as a
6 treatment center because they do a group chat every
7 day. And so the topic of the group chat was "The Way
8 to Happiness," among other Scientology propaganda, but
9 the majority of the group is "The Way to Happiness".
10 Q Okay. That rehabilitation center, it's State
11 approved, but it's not a State-run center; correct?
12 MS. GINAPP: Objection. Foundation.
13 THE WITNESS: No, it's not State run. It's
14 ran --
15 BY MR. GUTIERREZ:
16 Q The Church of Scientology; correct?
17 MS. GINAPP: Foundation.
18 THE WITNESS: ABLE, it's ran by ABLE. And
19 ABLE is an offshoot of the church, but it's a separate
20 entity than Division 6, which is the religious part of
21 Church of Scientology.
22 BY MR. GUTIERREZ:
23 Q Now, ABLE is an offshoot of the church. And
24 WISE is another offshoot of the church; correct?
25 A Yes.

1 MS. GINAPP: Objection. Foundation.
2 BY MR. GUTIERREZ:
3 Q What does "WISE" stand for?
4 A I do not know.
5 Q Does World Institute of Scientology
6 Enterprises refresh your memory at all?
7 A No, but that acronym would make sense.
8 Q What's your understanding as to what WISE
9 does, or provides for businesses?
10 MS. GINAPP: Objection. Form. Foundation.
11 THE WITNESS: It provides this Admin Tech, how
12 to run your company.
13 BY MR. GUTIERREZ:
14 Q Did anyone at Real Water ever talk to you as
15 to why these videos are mandatory?
16 A No, just that they are.
17 Q Did Brent or anyone else at Real Water ever
18 talk to you about any sort of financial benefit that
19 the company receives for having employees watch these
20 videos?
21 A Oh, like a subsidy from the Church of
22 Scientology, or something?
23 Q Yes.
24 A No. In my experience, the church doesn't help
25 anybody. The church takes money from everybody.

<p style="text-align: right;">Page 57</p> <p>1 Q So it's my understanding that each business, 2 including Real Water, licenses the technology from WISE 3 and pays a fee -- 4 A Pays them. 5 Q -- pays them a fee per month in order to use 6 this technology. Have you ever been told that? 7 A I don't have any experience with that. 8 Q Okay. 9 A But that would make sense because it's not -- 10 certainly, WISE wouldn't pay them. The Church of 11 Scientology, it doesn't exist because it pays other 12 people; it exists because other people pay them. 13 Q Do you know if there's any credit or subsidy 14 given to companies like Real Water on these licensing 15 fees if a certain number of people watch these videos? 16 MS. GINAPP: Objection. Form. Foundation. 17 THE WITNESS: I don't. 18 BY MR. GUTIERREZ: 19 Q Do you know what happens -- what's done 20 ultimately with each of these video reviews, where 21 they're sent to, or what's done with them? 22 MS. GINAPP: Objection. Form. Foundation. 23 THE WITNESS: I don't. To my understanding, 24 they stay on site at Real Water and are filed 25 someplace.</p>	<p style="text-align: right;">Page 59</p> <p>1 THE WITNESS: Before I agreed to go to the 2 Mission in Orange County, it had an attitude of 3 openness. And then once I started to get back into 4 Christianity, I saw that that wasn't the case. Like, 5 when I was going to the Mission in Orange County, they 6 told me you would be Buddhist Scientologist, you could 7 be a Christian Scientologist, you could be a Greek 8 Orthodox, Catholic Scientologist, and that's fine. And 9 then once I got into Narconon, which is like a 10 controlled environment of -- ran by Scientologists -- 11 you have L. Ron Hubbard's bust and statues all over the 12 place, his name is on everything -- I learned that 13 that's not the case -- that you could be a 14 Scientologist only. 15 BY MR. GUTIERREZ: 16 Q Within the company, you can be a Buddhist 17 Scientologist, you can be a Christian Scientologist. 18 Can you just be a Buddhist or a Christian? 19 A Yeah, certainly. 20 Q Are there going to be any sort of 21 ramifications from the company, or does the company 22 still look to impose some of these mandatory courses 23 down the employees? 24 MS. GINAPP: Objection. Form. Foundation. 25 THE WITNESS: I don't think that the courses</p>
<p style="text-align: right;">Page 58</p> <p>1 BY MR. GUTIERREZ: 2 Q You don't have any understanding if they're 3 sent anywhere else, or kept in a separate file, other 4 than the employee file? 5 MS. GINAPP: Objection. Asked and answered. 6 THE WITNESS: I don't. 7 BY MR. GUTIERREZ: 8 Q Okay. 9 A I know that when I did Scientology, you sign 10 just an immense amount of paperwork, a release for them 11 to keep every single document you write. And they have 12 you write it in your handwriting rather than on a 13 laptop, for some inefficient reason. But, so I know 14 the church will hold on to all your stuff for -- I 15 think I signed off on allowing them to hold on to it 16 for three years, or something. But I can't imagine 17 Real Water sending employee reviews to Flag or to the 18 Church. I don't know what the Church would want with a 19 non-Scientologist. The Church doesn't really -- if 20 you're not a Scientologist, they don't care. 21 Q How is that viewed, at least within the 22 company, with Scientology having -- looking down on 23 almost outsiders of the church? How did the business 24 look at employees who were non-Scientologists? 25 MS. GINAPP: Objection. Form. Foundation.</p>	<p style="text-align: right;">Page 60</p> <p>1 would change anybody's religious beliefs. But I was an 2 executive. I was at one point -- the only person I 3 reported to was Brent. There was no one else above me 4 but Brent. I was his Chief of Staff in Carson City. 5 We ate together breakfast, lunch, and dinner, when we 6 lived in the vacuum of the Legislative Session of 2015. 7 So we became very close. And my experiences are very 8 different than what an employee would have experiences, 9 because the employee would only see Brent maybe once or 10 twice in their entire time working there. Whereas, I 11 lobbied for him, I ran damage control, I ran his ground 12 game on his campaigns. We had a different relationship 13 than your average employee would. 14 So for the average employee, you can be 15 whatever religion you want. For those close to him, 16 he'd want you to be a Scientologist. 17 BY MR. GUTIERREZ: 18 Q But for the average employee, there would be 19 almost a fear of Brent or Aimee because they didn't 20 have that close relationship that you did; correct? 21 MS. GINAPP: Objection. Form. Foundation. 22 THE WITNESS: Absolutely. 23 MS. GINAPP: Argumentative. 24 BY MR. GUTIERREZ: 25 Q You said, "Absolutely"?</p>

1 **A "Absolutely."**
 2 Q Would you agree that the average employee can
 3 look at some of this coursework and think that it
 4 infringes on their religious beliefs?
 5 MS. GINAPP: Objection. Form. Foundation.
 6 THE WITNESS: I can't pretend to know what
 7 other people think. So I don't know how to answer
 8 that. Some of it seems pretty weird, dude. The Basic
 9 Study Manual, again, this is not the version that we
 10 use. We use a book. But some of this stuff that I
 11 read today in the Basic Study Manual is pretty
 12 Scientology-based. But, again, this is not the course
 13 I did. I did a book. And, again, I don't know, other
 14 than myself, any employee there that has done "Ups and
 15 Downs," "Personal Values and Integrity." Ryan Moodley,
 16 who has done a ton of courses, has done the first six.
 17 He hasn't done "Ups and Downs" himself, and he's been
 18 there for a year longer than I had, and he hadn't got
 19 into what can be considered the religious courses on
 20 here.
 21 BY MR. GUTIERREZ:
 22 Q Now, for you in particular, you said you're a
 23 Christian?
 24 **A Yeah.**
 25 Q At what point did you start looking into the

1 Scientology religion?
 2 **A In June when I was told that I had to go do a**
 3 **Purif, otherwise, you know, I couldn't continue to work**
 4 **with Brent.**
 5 Q By working with Brent, that also meant you
 6 couldn't work on his campaign; correct?
 7 **A Yeah.**
 8 Q So if you didn't do this Purif and go down to
 9 Orange County, you would have lost your job at
 10 Real Water and --
 11 **A Political ties.**
 12 Q And all political ties? Okay. And that was
 13 told to you by Brent directly?
 14 **A Uh-huh. Yes.**
 15 Q What exactly did he tell you?
 16 **A Just that. I mean, I ended up having to**
 17 **leave, I think, the next day or the day after.**
 18 Q How long was that course?
 19 **A I was in Orange County for months, man. I was**
 20 **in Orange County for, like, three months. I escaped**
 21 **the heat of Las Vegas last summer.**
 22 Q And it was strictly Scientology
 23 religious-based education that you were getting?
 24 **A Yes. And I was working full-time during the**
 25 **daytime, and then doing -- going to do -- going to the**

1 **course, course room at the Mission in the evenings.**
 2 Q Who paid for you to be out there?
 3 **A Real Water.**
 4 Q When you came back -- actually, what month did
 5 you come back to Las Vegas full-time?
 6 **A I mean, I would come back on the weekends to**
 7 **see my kid, and have my kid come out and visit me**
 8 **sometimes. But it was pretty much June to September, I**
 9 **want to say.**
 10 Q And then from September to November, were you
 11 going to Scientology courses in Las Vegas?
 12 **A No. I blew out of the church -- all right --**
 13 **so that's a term you're not going to understand. So I**
 14 **stopped doing Scientology. The church wouldn't allow**
 15 **me to actually complete my Purif because of some of the**
 16 **political affiliations I've had. And that pissed me**
 17 **off. And so I decided I didn't want anything to do**
 18 **with the church because it made me mad.**
 19 Q Is that one of the reasons that you were
 20 forced to do this rehabilitation?
 21 **A I was drinking maybe three days a week. And**
 22 **my attitude had changed. And Brent and I were close,**
 23 **so he could sense my attitude had changed. The reality**
 24 **is, he placed Aimee ahead of me, not as in -- it's his**
 25 **wife, of course, she's supposed to be ahead of me in**

1 **his mind -- but he placed her as my supervisor. She**
 2 **had zero experience in sales. And so I was being**
 3 **micromanaged by her, and having to not only do my job**
 4 **but explain my job to her at the same time. And so I**
 5 **had an attitude because I was very frustrated and**
 6 **wanted to quit on multiple occasions -- and my**
 7 **girlfriend at the time talked me out of quitting a**
 8 **number of times -- because of the way that Aimee**
 9 **handled me.**
 10 Q Okay.
 11 **A So ultimately, I feel that I was sent to**
 12 **Narconon because my attitude had changed towards the**
 13 **company. I had a crappy attitude.**
 14 Q When you came back from Narconon, that's when
 15 you spoke to Brent about giving your notice?
 16 **A No. I never spoke to Brent. I haven't spoken**
 17 **to Brent since I left on November 20th. I mean, we've**
 18 **had conversations over the phone. We've had a couple**
 19 **heated conversations over the phone. I was trying to**
 20 **get all of our chain accounts turned on. I completed**
 21 **the Southern California distribution network which --**
 22 **the goal of which is to get the chains turned over.**
 23 **For example, here in Vegas, we have Smith's,**
 24 **Albertsons, things like this, where the volume is**
 25 **really high. And so we would have conversations in**

1 reference to business. And we didn't see eye to eye on
2 getting the chains turned over. So we had a couple of
3 heated conversations while I was in Narconon. But I
4 haven't spoken to him since.

5 When I was held against my will at Narconon
6 when I wanted to leave and they wouldn't allow me to
7 leave, they tried to get Brent on the phone to talk me
8 out of it. And I told them that, "I don't care if I
9 get fired for leaving here, I'm not doing this."

10 Q Did Brent get on the phone at any point when
11 you were at Narconon and try to -- and threaten you by
12 saying your job is on the line if you didn't complete
13 this?

14 A No. No, I already knew that.

15 Q Okay.

16 A I mean, that went without saying. But I'm an
17 intelligent guy. So I already knew that if I didn't
18 complete Narconon, I would be fired. If I left before
19 Narconon was completed -- which is a 90-day program
20 approximately, sometimes it can take longer -- then I
21 would be fired.

22 So when I told them I wanted to leave, they
23 brought out every staff member they could to talk me
24 out of it, literally locked me in a room for an hour to
25 think about it. And I just said, "You know what? I

1 have a stronger will than you guys do, man. I told you
2 about this at 4:00 in the afternoon. My flight is not
3 until 7:00 in the morning. The reason I'm willing to
4 sit at the airport overnight is, you all can bring out
5 as big a guns as you want, bring down fucking Tom
6 Cruise himself. Like, I don't care. I'm leaving,
7 period. So you want to get Brent on the phone, get
8 Aimee on the phone, I'm not going to talk to anybody.
9 I'm going to sit here and wait until you release me.
10 If not, I'm going to call the police." And they
11 finally let me go.

12 Q Okay. When you came back to Las Vegas, what
13 conversations did you have with anybody at the company?

14 A I had conversations with employees there, and
15 had heard that Aimee said I'm no longer working with
16 the company prior to me being terminated. So I reached
17 out to ADP who does our human resources consulting and
18 accounting, payroll services, and told them what my
19 grievances were, and told them that I wanted to get
20 these resolved, I had zero interest in suing the
21 company myself, but that I had some grievances, and I
22 wanted to get those grievances resolved. And then met
23 with David Gardner and signed my separation paperwork.
24 And that's the last contact I've had with the company
25 other than sending David a text saying that this is a

1 waste of my time that I'm being subpoenaed to do all
2 this.

3 Q Did you have any conversations with Grecia?

4 A Not to my understanding.

5 Q Did you have any text messages at all with
6 Grecia about testimony or anything about you
7 participating in her case?

8 A She had hit me up, and we haven't -- we
9 weren't BFFs to begin with. She's unhappy with all of
10 this. But her and I haven't coordinated any of this
11 stuff. We're not on that level together. I don't have
12 a dog in this race. I really don't care, other than
13 I'm subpoenaed to be here. And from what counsel has
14 told me, and what other members of law enforcement have
15 told me, that I have to tell the truth.

16 Q So you're telling the truth whether that helps
17 or hurts Grecia's case; correct?

18 A Yeah. I don't care.

19 MR. GUTIERREZ: Okay. Let's attach these
20 exhibits.

21 (Exhibits 8-13 marked)

22 BY MR. GUTIERREZ:

23 Q Let's start in order with Exhibit 8. Do you
24 have that in front of you?

25 A What now?

1 Q Exhibit 8, the Non-Optimum Report.

2 A Yeah.

3 Q What is this report?

4 A These are write-ups.

5 Q This is a write-up from Bonnie regarding
6 Grecia; is that correct?

7 A Yeah.

8 Q Okay. What were the circumstances regarding
9 why Grecia was terminated?

10 A Ultimately, it was a number of things. I
11 don't know if the GPS one is in here. The GPS on one
12 of the cars was disabled. She -- yeah, the last page
13 of the Non-Optimum Report is ultimately why she was
14 terminated. I went to a couple stores and they said
15 that no one from Real Water had visited. And so
16 ultimately, that's when I made the decision because
17 of -- the example is today, we're sitting here going
18 over all this stuff -- because of lawsuits, you can't
19 just fire somebody. Given Nevada is a right-to-work
20 state, if you just terminate somebody, then they can
21 have a wrongful termination lawsuit against you.

22 Q Did Bonnie ever talk to you about Grecia's
23 work performance?

24 A Uh-huh.

25 Q That's a "yes"? What did she say?

1 A She didn't think that she was very good. And
2 you can tell from these write-ups that Bonnie had an
3 issue against Grecia.

4 I'm a male, and females have different things
5 than males have. Females have -- you know, we're very
6 direct in what we want to get. Women have emotions
7 more so than we do. And so I thought they just had
8 like a personality conflict. So when she first started
9 complaining about Grecia, I dismissed it. And then
10 when she -- just dismissing it to some personality
11 conflict. And then when she started to give me
12 specific examples of stores that Grecia was supposed to
13 have visited and didn't visit, I asked her to give me a
14 write-up on it, give me -- instead of just complaining
15 about it, to write it up, put it in writing, and show
16 me what specifics she was talking about.

17 Q And this is the write-up that you're looking
18 at, Exhibit 8?

19 A Yeah. There's a number of them here.
20 There's -- looks like -- I think it's three different
21 write-ups from Bonnie, only one of which looks like
22 Grecia signed -- no -- two of which Grecia signed.
23 Looks like four here. Never mind.

24 Q Looks like the one for 10-8, there was a
25 write-up because Grecia was sick, had been throwing up

1 for two days.

2 A Yeah.

3 Q Now, were there progressive disciplinary steps
4 that should have been done at Real Water like
5 write-ups, suspension, before termination?

6 MS. GINAPP: Objection. Foundation.
7 BY MR. GUTIERREZ:

8 Q Or was it just based upon management's
9 discretion?

10 A Nevada is a right-to-work state, man. If
11 somebody wants you to wear black shoes and you're
12 wearing brown shoes, you can be legally terminated.

13 Q I'm not talking Nevada law. I'm talking about
14 within the company, as far as the company following its
15 own policies and procedures for termination.

16 A The company policy is if you have three
17 Non-Ops, you can be fired.

18 Q Okay. How many did Grecia have?

19 A I wrote her up myself for a GPS thing that's
20 not here. But it looks like there's four write-ups
21 right here.

22 Q Did the company have policies and procedures
23 in place on how to prevent either religious
24 discrimination, or sexual harassment, or retaliation
25 within the workplace?

1 A Not really. Prior to Grecia, we never really
2 dealt with somebody objecting to the Admin Tech. So
3 like, this was like a new thing to deal with.

4 Q But from your understanding, have you heard of
5 these type of lawsuits related to Scientology in the
6 workplace throughout the country?

7 MS. GINAPP: Objection. Form. Foundation.

8 THE WITNESS: No. My first experience with
9 Scientology was with Real Water.

10 BY MR. GUTIERREZ:

11 Q At any point following Grecia's lawsuit, did
12 you, or Brent, or anyone at Real Water discuss how
13 there had been multiple lawsuits across the country
14 against employers who were forcing Scientology on their
15 employees?

16 MS. GINAPP: Objection. Form.

17 THE WITNESS: No.

18 BY MR. GUTIERREZ:

19 Q Okay. So you said that there was really no
20 policy or procedure in place regarding discrimination
21 and harassment; correct?

22 A Yeah.

23 Q Okay. Go to that next exhibit that you have
24 in front of you. That's Exhibit 13. These are what
25 purport to be text messages from you and Grecia. Do

1 you see that?

2 A Uh-huh.

3 Q Is that a "yes"?

4 A Yes.

5 Q I'll represent to you that it looks like
6 these -- well, do you know when these were sent to
7 Grecia? Can you tell based on your phone when these
8 were sent?

9 A I can't.

10 Q Was it within the last 60 days?

11 A I do not know.

12 Q Okay. Do you have your phone with you that
13 you can check? I want to authenticate to make sure
14 that this is an accurate depiction of text messages
15 that you sent to and from Grecia.

16 A Some of this is like edited, so it's hard to
17 tell, like, the font changes.

18 Q Where are you looking at specifically?

19 A It appears in --

20 Q When you reference page numbers, see that
21 reference where it says PLTF00185?

22 A PLTF00191.

23 Q Okay.

24 A The font changes. It says, "I am a
25 mastermind, love being underestimated." "Bet they

1 **didn't know you were like that." And then the font**
 2 **changes to something else. If you go to the previous**
 3 **page, PLTF00190, it goes from one font to another font.**

4 Q Right. Is that because there's been a text
 5 message thread that's been cut and pasted within this
 6 thread?

7 A Yeah, that could be the case.

8 Q Okay. So what I need you to clarify today is
 9 that this is a true and accurate depiction of text
 10 messages between you and Grecia, for evidentiary
 11 purposes.

12 A Yes.

13 Q Okay. You have no reason to dispute the
 14 validity or the contents of these messages; correct?

15 A Correct.

16 Q Okay. But everything in those text messages
 17 has been consistent with what you've told today under
 18 oath; is that correct?

19 A Yeah. I don't have a dog in this race. I
 20 mean, I know that Real Water is a good product, but I
 21 don't have a dog in this race.

22 Q On 186, you state that you "have an audio
 23 recording of Aimee Jones telling the head of human
 24 resources that she has to force every employee to do
 25 courses that would help you." What does that mean?

1 A One of the employees there recorded Aimee
 2 stating that everyone had to do Scientology coursework.

3 Q Who was that employee?

4 A Ryan Moodley.

5 Q Have you heard that recording?

6 A I have not.

7 Q But that recording is of Aimee telling -- that
 8 recording is consistent with what you've testified
 9 today, which is that the Real Water coursework is not
 10 optional, it's mandatory; correct?

11 A Yeah.

12 Q So there's nothing different from what that
 13 recording would say other than what you've told us
 14 which is what they've said is optional is actually
 15 mandatory; correct?

16 A Correct.

17 Q You say that, "I have known they force people
 18 to do Admin Tech Scientology for a while but they
 19 started to force me" -- you -- "to do religious
 20 Scientology about six months ago." That's what we
 21 talked about already with you --

22 A In June.

23 Q -- doing the Orange County trip; correct?

24 A Yeah.

25 Q So that's consistent with what you testified

1 to.

2 Anything else that we haven't discussed today
 3 that you'd like to talk about regarding this particular
 4 case or your knowledge of Real Water's policies and
 5 procedures regarding religious discrimination or
 6 retaliation?

7 A What is the rest of this stuff?

8 Q The rest of this stuff -- we can go through
 9 it -- are documents which pertain specifically to
 10 Grecia's termination and Bonnie's time sheets, which I
 11 have a question or two regarding Grecia.

12 A These are copies of e-mails?

13 Q What you have in front of you is Exhibit 11.
 14 I took Bonnie's deposition about six weeks ago. She
 15 said that she periodically sent you Grecia's time
 16 sheets. And that's what this is.

17 A Okay.

18 Q You've seen this document, correct, Jeremy,
 19 Exhibit 11?

20 A I haven't seen this document before.

21 Q What were the purposes of Grecia's time sheets
 22 being sent to you by Bonnie? Was that just routine by
 23 every employee?

24 A Bonnie was -- I would have Bonnie gather -- at
 25 one point in time, we had a number of demo girls,

1 merchandisers, brand ambassadors, whatever title you
 2 want to give it. And so I would have Bonnie organize
 3 them and send them to me.

4 Q Okay.

5 A In the coursework, the definition of an
 6 executive is a person who gets everyone else to do
 7 their job. So I would have -- I would streamline
 8 things and have -- the same way I would have Ryan
 9 Moodley do stats for me of my department, I would have
 10 Bonnie do stats and collect stats of everybody else,
 11 and then turn them in to me so I could focus on
 12 expansion and not be stuck in the muck of having to
 13 gather paperwork and stuff like that. I would delegate
 14 that to other people.

15 Q Got it. Okay.

16 Exhibit 12, which is in front of you, is from
 17 the Nevada Equal Rights Commission. What this is is a
 18 Charge of Discrimination that Grecia had filed as part
 19 of her -- the administrative claim for this type of
 20 lawsuit. This was received by the company -- it
 21 appears in January of 2016 -- which is three months
 22 before she filed her lawsuit.

23 Do you recall any conversation with anybody at
 24 the company regarding this charge of discrimination?

25 A Hold on. This was filed three months prior to

1 **her termination?**

2 Q No, three months prior to her filing the
3 lawsuit. So she was terminated in October of 2015.

4 **A Okay.**

5 Q She filed this in November of 2015. This
6 Charge of Discrimination was sent by the Nevada Equal
7 Rights Commission to Real Water requiring them to
8 respond by February 25th, 2016. So this was well
9 before the lawsuit was filed, and well before --

10 **A I just wanted to understand the timeline.**

11 Q Okay. So given that, because one of the
12 issues that I've seen is that Brent Jones testified or
13 said in the media that the lawsuit, the timing was
14 suspect because it was right before the primary.

15 **A Yeah.**

16 Q And that they had no knowledge of Grecia's
17 complaints. This document proves otherwise because it
18 states that as of January 2016, five months before the
19 primary, he had actual knowledge that she had made
20 these complaints of discrimination. Do you recall any
21 conversations with Brent, or anyone else at the
22 company, as to Grecia's claims of how --

23 MS. GINAPP: Objection. Sorry.

24 MR. GUTIERREZ: Go ahead.

25 MS. GINAPP: No, it's gone on for a while, but

1 I thought you were done. Are you done?

2 BY MR. GUTIERREZ:

3 Q Very simple: Did you have any conversations
4 with Brent, or anyone at the company, in January or
5 February of 2016 regarding Grecia's claims prior to the
6 lawsuit being filed?

7 MS. GINAPP: I'm going to object to form.

8 THE WITNESS: At that point, we were being
9 sued by another company, that was a bigger concern
10 because we were losing that lawsuit -- we had already
11 lost that lawsuit. We had lost that lawsuit in
12 November. And they were sweeping our bank accounts at
13 that point. So at that point, we had bigger fish to
14 fry than this. We had issues of making payroll because
15 our bank accounts were being hit. Maria, our
16 accountant at the time, quit literally the day that our
17 bank accounts were hit. So, like, she was in cahoots
18 to share information with them of bank accounts that
19 only she knew about that were hit. So we had bigger
20 issues. We had issues, we couldn't make payroll, man.
21 BY MR. GUTIERREZ:

22 Q This is what time frame again? January of
23 2016?

24 **A Yeah, this is in January. Our bank accounts**
25 **were being swept. So I had to go to political friends**

1 **of mine to fund raise and sell Real Water shares to so**
2 **we could make payroll. So we had bigger concerns than**
3 **a complaint at that point in time. So the**
4 **conversations we were having about legal problems at**
5 **that time was this other case.**

6 Q Who was the lawsuit from?

7 **A It's called Real Water District. We sold a**
8 **territory to another company. And evidently, Anthony**
9 **was infringing on that exclusive distribution**
10 **agreement, and we were selling into their exclusive**
11 **territory, and then we lost that case in court. And**
12 **then bank accounts were being hit. So the**
13 **conversations we were having about legal problems at**
14 **that time weren't in reference to this Nevada**
15 **Department of Employment, Exhibit 12.**

16 Q So to be clear, that lawsuit wasn't a
17 discrimination-based lawsuit? It appears to be a
18 contractual or commercial litigation --

19 **A Yeah.**

20 Q -- where it was reduced to judgment, and then
21 bank accounts were being garnished? Is that fair to
22 say?

23 **A Yeah. It was all through mediation. And the**
24 **court that had jurisdiction was State of California,**
25 **not the State of Nevada.**

1 Q Okay. So at that time, the company was
2 focused on survival?

3 **A Yeah.**

4 Q Not necessarily responding to a NERC complaint
5 and whether they got it or not; fair to say?

6 **A Yeah.**

7 Q Okay. Did brand ambassadors in general have
8 to fill out reports and return them to you as part of
9 their employment?

10 **A Uh-huh.**

11 Q Is that a "yes"?

12 **A Yes. Sorry.**

13 Q And if they didn't, were they written up or
14 given a Non-Optimum Report? Or was that not enforced?

15 **A Sometimes it was enforced. With other**
16 **employees, I had written them up for not turning in**
17 **stats. That's really a human resources function, where**
18 **the head of human resources, Shawna, will write**
19 **somebody up for not turning in their stats. I know in**
20 **the case of Deon Humphrey, I issued him a couple of**
21 **Non-Ops for not turning in his stats. But ordinarily,**
22 **Shawna would issue those, for stats specifically.**

23 Q I've seen the name on some reports. Her name
24 is Christy. She was in charge of HR, Christy
25 Pantelakis.

1 A Yes.
 2 Q When did she leave?
 3 A She left right -- I don't know the exact time
 4 frame, actually. I'm trying to think of -- I mean, I'd
 5 have to look at my Facebook. It was right after one of
 6 the fights. We had fights, first every other month,
 7 then we started doing them quarterly. But she went to
 8 the corporate retreat with us, which was actually this
 9 time last year. And then by the primary, she was gone.
 10 So the primary was the second Tuesday in June. So
 11 by -- I want to say June 8th, she was gone. But I
 12 don't know an exact date.
 13 Q Do you know who replaced her?
 14 A Yeah. Shawna ended up replacing her. Shawna
 15 was my assistant in sales. For a while, we didn't have
 16 anybody in HR. Clare was -- Clare LaHara was kind of
 17 filling that position, and then -- oh, no, that's
 18 right -- I had Lisa Marie Bailey, did the HR position
 19 for a while. And she was quite confrontational, and we
 20 had to let her go.
 21 Q Did you ever take over HR at any point?
 22 A Yeah, I was the head of HR.
 23 Q At what point?
 24 A Somewhere between January and June.
 25 Q Of 2016?

1 A 2016.
 2 Q After June, that's when you said this Shawna
 3 person came in and took over?
 4 A Well, really, I mean, Shawna still isn't over
 5 HR. Technically, at this point, Aimee is over HR,
 6 according to the organizational board. But at one
 7 point, I never had the official title of it, never saw
 8 like a salary bump for taking on additional
 9 responsibility. But it was my job to make sure that HR
 10 ran smoothly.
 11 Q What was Aimee Jones' position while you were
 12 there? How did her position evolve?
 13 A To my understanding, before my time, she ran
 14 the demo girls. And then when I got there, she was
 15 involved in operations, which means the manufacturing
 16 of the actual product, blowing the bottles, filling the
 17 bottles up, labels, stuff like that. And then Brent
 18 thought that she was doing a great job, and so he would
 19 just give her more responsibility. And then -- I mean,
 20 ultimately the reason I blew out of the company is
 21 because of having to deal with Aimee Jones.
 22 Q Okay. Did she have a supervisory capacity
 23 over you?
 24 A It evolved to that, yeah.
 25 Q At what point did she get that supervisory

1 capacity?
 2 A Right towards the end. I mean, that's when my
 3 attitude changed, because I was having to explain stuff
 4 to someone who's never had any experience in sales.
 5 Granted, all the beverage industry knowledge I have, I
 6 had to teach myself, because there's no one there to
 7 explain it to me. Brent is not in the marketplace. He
 8 couldn't know it. Anthony is not in the marketplace.
 9 He doesn't know it. Really, the Budweiser guys that I
 10 befriended taught me everything about the beverage
 11 industry. And so I was having to explain all this
 12 stuff to someone who doesn't understand it, and do my
 13 job, and be micromanaged by that same person. And it
 14 got pretty frustrating.
 15 MR. GUTIERREZ: Okay. I know you have some
 16 questions, right, Kristol?
 17 MS. GINAPP: Yes.
 18 MR. GUTIERREZ: I'm going to pass the witness
 19 for now. So Kristol will ask you some question.
 20 EXAMINATION
 21 BY MS. GINAPP:
 22 Q I want to talk about Grecia to start with.
 23 You were the representative of the company who
 24 interacted with Grecia; correct?
 25 A Yeah.

1 Q You testified that you were her supervisor;
 2 correct?
 3 A Uh-huh.
 4 Q So you were the one that would make decisions
 5 regarding her employment; is that correct?
 6 A Yeah. I mean, ultimately ADP does. ADP
 7 does -- I don't know legally how to explain it -- but
 8 they more or less have to back up firing somebody. I
 9 don't know if they do some sort of legal insurance for
 10 a wrongful termination suit, but it always seemed like
 11 no matter what I wanted to do, I still had to get
 12 Brent's approval and, more importantly, even more than
 13 Brent's approval, ADP's approval to terminate somebody.
 14 Q But you were the one who terminated Grecia;
 15 correct?
 16 A Yes.
 17 Q You were the one who made the decision?
 18 A Yes.
 19 Q And you asked Brent for approval?
 20 A Yes.
 21 Q And you asked ADP for approval?
 22 A Yeah.
 23 Q And they both backed you up on it?
 24 A Yes.
 25 Q Okay.

1 A ADP said that I had to have write-ups. So the
2 reason we have all these write-ups in Exhibit 8 -- if
3 you look at the date on them, they're all dated the
4 same day. That's not a common practice. And I don't
5 know why my write-up isn't here, but my write-up was
6 for disabling a GPS.

7 Q Let's talk about that real quick. Tell me
8 more about the -- the write-up was against Grecia for
9 disabling a GPS?

10 A Uh-huh.

11 Q Was that on a company car?

12 A Yes.

13 Q Okay. Can you explain to me what happened?

14 A All right. So none of this is friendly, big
15 brother stuff that anybody in America wants to think
16 about, because we all want to feel like we're
17 independent. But in my experience, people lie. And so
18 I started using, in campaigns, when we went from paper
19 files to smartphone apps, there's a term called a geo
20 timestamp. A geo timestamp is ultimately a GPS
21 tracking system on somebody's phone. I found this in
22 campaigns to be really effective because I could tell
23 if the canvasser is knocking on a door at a super voter
24 where they're supposed to be, or if they're at
25 Starbucks or McDonald's.

1 So I took that same tool and transferred it
2 over on Real Water from a company called
3 MobileTrackingConsulting.com. And for a monthly fee,
4 we could install GPS onto all of our company vehicles,
5 plugging it into the auxiliary port. How a mechanic
6 reads the computer of your car to tell you what's wrong
7 with it, using that same port you, plug a little device
8 in there, and it does the same thing as a geo
9 timestamp. It follows the vehicle everywhere.

10 Q Kind of like the same thing -- I assume that,
11 I don't know if you know this -- Geico or somebody, or
12 Progressive advertises -- if you don't know, that's
13 okay.

14 A I don't know. But it's like LoJack.

15 Q Okay. And the company can monitor where the
16 car is and what it's doing?

17 A Yeah. You can log in and see how long a car
18 has been turned off, how long a car has been turned on,
19 the address it stopped at. It's been very effective to
20 find if people are on task or off task.

21 So I had another employee that disabled her
22 GPS. So I knew what it looked like if a GPS was
23 sitting there because, for some reason, it didn't have
24 a function to tell if you if it was disabled or not.
25 If somebody unplugged it, it had some battery life to

1 where it would just say that it's sitting right there
2 in that same location.

3 When I saw that the GPS was sitting in the
4 same location and wasn't working anymore, to me, that's
5 a terminational offense. If you're not on task doing
6 what I've told you to do, just that by itself, to me,
7 is enough to want to fire somebody.

8 Q So that was -- so just to clarify -- you
9 pulled at some point the GPS for Grecia's car?

10 A Yes.

11 Q Her company-owned car; correct?

12 A Correct.

13 Q That was the car that you guys at the company
14 provided to her to do her work as a brand ambassador;
15 correct?

16 A Yeah. So we had a whole fleet of cars. I
17 don't recall which vehicle it was because we had a
18 vehicle that was totaled. She was sideswiped, or
19 whatever, in one car, so we switched cars at one point.
20 But one of the vehicles had GPS that was disabled.

21 Q Was it, to your knowledge, the vehicle that
22 she was driving at the time of her termination?

23 A Yeah.

24 Q Okay. Did you address your concerns about the
25 GPS with Grecia?

1 A Yeah.

2 Q What was her response?

3 A So with a lot of my communication, I would
4 follow Brent's lead on the fact that an executive's job
5 is to make sure that other people are doing their job,
6 so with some dealings, I would deal hands-on with
7 employees, with some stuff I would delegate. And so I
8 would delegate that responsibility to Bonnie, and say,
9 "Bonnie, this is how I feel, you need to do this action
10 with this person, this action with this person," and
11 give them a to-do list. And then Bonnie would come
12 back to me at the scheduled time and give me a
13 disposition of what had transpired.

14 And so Bonnie told me that Grecia said that
15 the GPS, that she ultimately didn't disable it herself,
16 that she found it that way.

17 Q Okay.

18 A But the reason that all these are dated the
19 same day is because once I was fed up, I was fed up.
20 Once I went and visited a couple stores myself and saw
21 that they weren't being merchandised, I made the
22 decision I wanted the fire her.

23 Q So what stores did you visit?

24 A A Smith's on Flamingo and -- it may not be a
25 Smith's, but it's a grocery store on Flamingo and

1 **Buffalo, and then for sure a Vons on Desert Inn and**
2 **Durango.**

3 Q What did you find at the Smith's?

4 A **That they had never seen Grecia.**

5 Q Is it your understanding that Grecia was the
6 brand ambassador that was supposed to service that
7 particular Smith's, or whatever it was?

8 A **Yeah.**

9 Q What did you find for Vons?

10 A **Same thing.**

11 Q She wasn't servicing it?

12 A **Correct.**

13 Q They had never met her?

14 A **Correct.**

15 Q Is it your understanding that that Vons on
16 Durango was one that Grecia was supposed to go to?

17 A **Yeah.**

18 Q How do you know that these two stores were
19 ones that Grecia was supposed to go to but not Bonnie?

20 A **Because we divided up the city. So my mind,**
21 **unfortunately, forever more, works in the grid of**
22 **politics. So I just take those same skills and**
23 **transpire it to everything else. I take a map in an**
24 **Assembly district, and I break it up in the most**
25 **efficient way possible. And so I take the city and**

1 **broke it up -- okay, what does Bonnie live, where does**
2 **Grecia live -- and broke up the city the same way, and**
3 **said, "Okay, this half of the city, Bonnie, you're**
4 **going to do; this half of the city, Grecia is going to**
5 **do." And that pissed Bonnie off because Bonnie had**
6 **some good stores that she had relationships with, and**
7 **she could build case stacks and get financial**
8 **incentives for. But tough titties said the kitty, and**
9 **that's how it is.**

10 Q Do you know if they ever exchanged stores that
11 they were -- say, like, on a particular date if someone
12 was on one side of town or the other, for whatever
13 reason -- do you have any knowledge of them ever
14 switching stores?

15 A **I don't. I don't.**

16 Q Okay. Were there times when Bonnie would go
17 out of town to work?

18 A **Oh, yeah, all the time.**

19 Q What happened with her stores while Bonnie was
20 out of town?

21 A **They would typically get neglected.**

22 Q Okay.

23 A **My focus became more so California than this**
24 **marketplace. I had no financial interest in Las Vegas.**

25 **Anthony Randolph gets a commission off Nevada Beverage,**

1 **and I didn't at the time. I didn't ever. So my focus**
2 **became -- I opened up the entire state of California.**
3 **So my financial interest was to promote California, not**
4 **Nevada.**

5 **So I kept Bonnie on the road. I mean, I don't**
6 **know if we're talking about the timeline of Grecia and**
7 **Bonnie at the same time, or in its entirety, I wanted**
8 **them both on the road all the time. That's where my**
9 **kind of frustration with Grecia began is, she couldn't**
10 **travel, because I want people out of the city. I**
11 **didn't have a financial interest to have people working**
12 **in the city of Las Vegas. It's not my commission. I**
13 **wanted them in California developing that marketplace.**

14 Q While Bonnie was gone, were there discussions
15 about Grecia covering Bonnie's stores?

16 A **Yeah.**

17 Q Was there an expectation that she would
18 attempt to cover Bonnie's stores while Bonnie was out
19 of town?

20 A **Yeah, but the problem that I found is that I**
21 **didn't see anything getting covered, man. I created a**
22 **form that's not one of the exhibits that -- and it**
23 **didn't start with Grecia. It started with another**
24 **employee, Amanda, that she wasn't going to the stores.**
25 **So I created a form where you have every single store**

1 **you go to, they --**

2 Q Do you want to look at Exhibit 10 and see if
3 that's the form?

4 A **Yeah. Okay, this is it.**

5 Q Okay.

6 A **Yeah. Strike that. This is it.**

7 Q So you created the form that's part of
8 Exhibit 10, that's titled Real Water Product
9 Demonstration Report?

10 A **Yeah.**

11 Q Why did you create that? What prompted you to
12 do it?

13 A **Left to their own devices, while the cat's**
14 **away, the mice will play. And, again, the same reason**
15 **that I would have all of my political employees sign**
16 **non-disclosure agreements, agreeing to geo timestamps.**
17 **I don't have a whole lot of trust in human beings. And**
18 **so I wanted to have verification that stores they said**
19 **they were visiting, they were actually visiting.**

20 Q There is a place on the form -- it's near the
21 top -- it says, "Store Manager," colon, and then there
22 would be a blank space?

23 A **That's the main function of the whole form.**
24 **The rest of the form, I really could care less about.**
25 **And just for them to fill out.**

1 Q Can you explain to me why that's the main
2 function of the form where it says "Store Manager"?

3 **A Because signatures are hard to --**

4 MR. GUTIERREZ: Where are you looking at,
5 Kristol?

6 MS. GINAPP: It's right at the top. It says,
7 "Store Manager." It's not blank on the first page.

8 MR. GUTIERREZ: Got it. Sorry.

9 THE WITNESS: Because it's hard to forge a
10 whole bunch of signatures. You could forge one or two,
11 but it's hard to forge 20 different signatures and have
12 them look different.

13 BY MS. GINAPP:

14 Q So the idea was your product -- correct me if
15 I'm wrong, I'm trying to summarize my understanding of
16 your testimony -- the idea was that your brand
17 ambassadors would have these filled out whenever they
18 went to any store; is that correct?

19 **A Yes. So for every single store they visited,**
20 **I wanted a signature from the manager of every store**
21 **they visited to verify they've been to that store.**

22 Q Then what would the brand ambassador do with
23 this form after it was completed?

24 **A Turn it in to Bonnie, who would then bring**
25 **them all to me.**

1 Q Did anybody check to see if the "Store
2 Manager" blank was signed?

3 **A Yeah.**

4 Q Who did that?

5 **A I did. And Bonnie did. And then Bonnie would**
6 **point out to me if signatures weren't signed, or if she**
7 **was skeptical to the validity of it actually being done**
8 **correctly.**

9 Q How often were brand ambassadors supposed to
10 turn these in?

11 **A So reality -- they're supposed to turn them in**
12 **every week. What actually transpired is maybe every**
13 **couple weeks to once a month, to where I would get a**
14 **stack of -- I don't know -- an inch and a half thick of**
15 **all these forms at once being turned in.**

16 Q Do you recall whether or not Grecia was
17 good -- for lack of a better word -- about turning
18 these product demo reports in in a timely manner?

19 MR. GUTIERREZ: Objection. Form.

20 THE WITNESS: Not particularly. I mean, she
21 was not good about turning them in.

22 BY MS. GINAPP:

23 Q Can you explain to me why you say that?

24 **A At first she would turn them in. And then the**
25 **more -- and I don't know if it's because my attitude**

1 **changed, or what -- once I get skeptical of somebody,**
2 **then my whole persona is going to change. That's just**
3 **who I am. So I was probably more of a dick to her than**
4 **I was when I first hired her. And I know that that's**
5 **not good for productivity in your juniors. But she**
6 **went from turning them in all the time to, at the point**
7 **of termination, us not receiving them at all. She had**
8 **said that they blew out the window of the car. But I**
9 **don't know.**

10 Q Do you recall at the time of her termination
11 how long it had been since she had turned in her
12 product demo reports?

13 **A I think it had been about a month.**

14 Q Okay. How often was Grecia in the actual
15 Real Water office?

16 **A Not very often. If they're in the office,**
17 **they're not on task. You know, they had to turn their**
18 **time sheets in, and they had to turn in stats on**
19 **Mondays. So really Mondays and Fridays for, like, an**
20 **hour or two. If they were in the office more than**
21 **that, I would kick them out.**

22 Q Did there come a point in time when Grecia
23 started turning in her stats or her time sheets by text
24 or by e-mail?

25 **A Yeah.**

1 Q And at that point, did she come into the
2 office at all, to your recollection?

3 **A I hadn't seen her physically for -- I don't**
4 **know how long -- but quite some time, when she was**
5 **terminated. Her hair was a different color. She had**
6 **lost weight. I mean, there was a marked difference**
7 **between her appearance when I saw her the last time**
8 **when I terminated her.**

9 Q Okay.

10 **A But that's how I wanted it. I much prefer**
11 **them to be in the field. This is why I took the**
12 **efforts of creating a form to have them sign. This is**
13 **why I took the efforts of tracking them via GPS. This**
14 **is why we have the technology of smartphones, is so**
15 **they don't have to be in the office, so they can be in**
16 **the field being productive. If they're in the office,**
17 **they're going to take my sales team off task, if**
18 **they're girls -- not that -- I had some female**
19 **salespeople. But for the most part, the men that**
20 **survive in sales, or the people that survive in sales**
21 **are men, because they can be on the road, they can be**
22 **away from families, they can be non-emotional about**
23 **things. So most of my salespeople ended up being**
24 **males. When the girls would come to the office, they**
25 **would distract the males. So I would prefer to have no**

1 females come into my office because they would distract
2 my salesmen from being on task.

3 Q Okay. To do the Admin Tech coursework --

4 A You have to come into the office.

5 Q The employees had to come to the office;
6 correct?

7 A Yeah.

8 Q Okay.

9 A Unless you lived in California, in which case
10 we would give it to you in person, and then you would
11 e-mail us your stuff.

12 Q Are you aware of any time that Grecia came
13 into the office to do any Admin Tech coursework?

14 A Other than the -- I'm not, other than these
15 write-ups for the videos and stuff, I'm not. Again, I
16 was not over courses. Like I stated earlier, I really
17 couldn't care less about course. I wanted to make
18 money. So, I don't know.

19 Q Just could be clear, the videos are not part
20 of the Admin Tech coursework for which you would get a
21 raise if you completed a course, correct?

22 A Correct. These are just orientation videos
23 that everybody is forced to do.

24 Q Did you ever, to the best of your
25 recollection, ever impress on Grecia that she needed to

1 come in and do the coursework?

2 A I mean, there might be some e-mails, because I
3 had to press on everybody to do it. But, like I said,
4 I wasn't very good about forcing people to do
5 coursework because, other than the statistics for us to
6 do our jobs, and then fill out these reports, as long
7 as their stats came in, I didn't really care.

8 Q So would it be fair to say that it was not
9 important to you whether or not Grecia did the
10 coursework?

11 A Not important to me at all.

12 Q Do you have any recollection of any
13 conversations you had with Grecia about her doing the
14 coursework or her saying she didn't want to do the
15 coursework?

16 A No. No. But we didn't have a relationship
17 like that. Like, Bonnie and I were relatively close,
18 because she worked for me on the political side as
19 well, and was a go-getter. Grecia was an employee.

20 Q Did you hear anything at all while Grecia was
21 an employee to indicate that she had told Bonnie, or
22 someone else, that she didn't want to do the coursework
23 and she felt it was Scientology?

24 A Bonnie said something about that, yeah. But,
25 again, I really didn't think the coursework was my

1 priority. I felt people visiting stores, me closing
2 Budweisers, making the company more productive is my
3 responsibility, not micro-managing people doing some
4 courses.

5 Q So would it be fair to say that, as Grecia's
6 supervisor, you would have rather had her be out
7 visiting the stores than in the office doing the
8 coursework?

9 A Yes.

10 Q Okay.

11 A Which is not the attitude that I was supposed
12 to have, but, yes.

13 Q But you were Grecia's supervisor. And would
14 it be fair to say that that would have been the
15 attitude she was receiving from the company, would have
16 been your attitude, that it didn't matter whether or
17 not she did the courses?

18 A I mean, short of -- there may be e-mails out
19 there, you know -- I mean, last time I looked in my
20 e-mail box, I had thousands of them. To satisfy
21 whatever demands I had from ownership, I would shoot
22 out random e-mails to everybody that, you have to do
23 this. But short of that, I really didn't care.

24 Q Okay. So just to clarify, did Grecia's
25 failure to do any of the Admin Tech courses have any

1 impact on your decision to terminate her employment?

2 A No.

3 Q Did your hearing from Bonnie that Grecia
4 thought maybe the courses were Scientology and she
5 didn't want to do them, did that have any impact on
6 your decision to fire her?

7 A No.

8 Q Okay.

9 A It had impact on Bonnie. But, again, Bonnie
10 wasn't her supervisor.

11 Q What do you mean, it had impact on Bonnie?

12 A Bonnie buys into the whole thing. She's not a
13 Scientologist, but she's done a tremendous amount of
14 course. And Bonnie had a beef with Grecia, for
15 whatever reason. So she had issues, but she wasn't her
16 boss. She wasn't in the capacity to fire her, hire
17 her, do whatever. I would duly note her complaints,
18 and that's why I created forms that had to be signed.
19 I would take what she had to say and consider it, but
20 her opinion didn't -- wasn't the deciding factor.

21 Q Did Bonnie make any statements to you that she
22 was upset with Grecia because Grecia wouldn't do the
23 courses?

24 A Not because she wouldn't do the courses. I'm
25 trying to think. It's all been kind of -- you know, so

1 long ago.

2 Q Well, Bonnie is a hard worker; right?

3 A Bonnie is an incredibly hard worker.

4 Q Does she have patience with people who are not
5 hard workers?

6 A Not at all.

7 Q Would it be fair to say at least your
8 impression was that she struggled with Grecia because
9 she didn't see Grecia as hard a worker as she was?

10 A Yeah.

11 Q Okay.

12 A I mean, I worked an event -- I mean, if you go
13 to my Facebook, I got a picture of Grecia and I. We
14 worked an event together, and sweated our butt off,
15 outside in the middle of the summer, and she worked the
16 event really well. But according to Bonnie, she did
17 nothing. And that's why I created a form to start
18 monitoring things because my experience was one thing,
19 Bonnie's experience was another. And so it was my job
20 to figure out what the reality of that was. And my
21 experience was the reality was that it was somewhere in
22 between. She had maybe some stores that she visited
23 all the time. But then there were absolutely four
24 certain stores that she never visited.

25 Q And you verified those stores --

1 A I went in person and verified myself
2 because -- I take more of an offense of people that are
3 not hard workers than Bonnie does, because I'm an
4 exceptionally hard worker. But, like Bonnie, I get
5 frustrated with people that aren't hard workers. And
6 so when I would terminate people in the political
7 world, it was a whole lot different than how I would
8 have to go through all this paperwork here. I would
9 make quite a scene to make sure my other independent
10 contractors knew that it would be bad if they were
11 publicly humiliated and I fired them.

12 Q And just to clarify: No one at Real Water
13 told you to fire Bonnie [sic]? You made that decision
14 on your own?

15 A Grecia.

16 Q Oh, Grecia. Sorry. I'll ask the question the
17 correct way. Strike that.

18 Just to clarify: No one at Real Water told
19 you to fire Grecia; correct?

20 A Correct.

21 Q Okay. Would you agree that her termination
22 was due to performance only?

23 MR. GUTIERREZ: Object to form.

24 THE WITNESS: Yes. I mean, some of it had to
25 do with medical issues that she had. She couldn't

1 carry boxes. You know, there were limitations to what
2 she could do or not. As a corporation, you can't
3 discriminate, or whatever, but it gets really fricking
4 frustrating when somebody can't do their job.

5 BY MS. GINAPP:

6 Q But you were working with her to the best of
7 your ability, correct, on those medical issues?

8 A Yeah. But it's kind of hard if somebody can't
9 do their job because they can't lift a case of water.

10 Q To the best of your knowledge, did Grecia ever
11 tell you that the reason she wasn't visiting the stores
12 was because of her medical condition?

13 A No.

14 Q Was Grecia ever disciplined for not doing
15 coursework, the Admin Tech coursework?

16 A She might have had verbal. I don't think we
17 have anything in writing.

18 Q Did you ever verbally counsel her as a
19 disciplinary as opposed to encouragement?

20 A There might -- I don't know.

21 Q Okay.

22 A In all sincerity, I don't know. I know that
23 I've given a bunch of verbals to juniors about getting
24 your coursework done, because I would get verbals from
25 above me. And so in the corporate world, stuff rolls

1 downhill. And so you just pass it along. But I don't
2 think we had any physical hard copy write-ups to her
3 for not doing coursework. I remember learning that she
4 was Catholic to some degree. I don't know how that
5 came about. But I remember learning that she was some
6 form of Catholic at some point.

7 Q Did that make any impression on you
8 whatsoever?

9 A I don't care.

10 Q Do you recall Grecia ever complaining to you
11 about Scientology in the workplace?

12 A Everybody complained about Scientology in the
13 workplace. I don't recall her as being more or less
14 than anybody else's.

15 Q How often did you speak with her?

16 A In reality, maybe once or twice a week, mostly
17 via text. I spoke more to her in the interview
18 process, in the termination process, than I did while
19 she was working there. But I would set it up that way.
20 Like, we would have stats and things that would monitor
21 and tell me if somebody is doing good, if you're doing
22 bad. You would hear from me if you're doing bad. If
23 you're not hitting your stores, then you'd hear from
24 me. Otherwise, I don't really care. I was focused on
25 expanding that work, not micro-managing people.

1 Q Do you have a specific recollection of Grecia
2 complaining to you about Scientology?

3 A I remember one time at the office, she did
4 complain about Scientology.

5 Q Do you remember what she said?

6 A I don't. I just remember it was cloudy
7 outside. I remember I was outside smoking a -- at that
8 time, I smoked cigarettes. And she was complaining
9 about something about Scientology. It was before her
10 hair was purple. I remember that much. When I
11 terminated her, she had either purple hair or had a
12 purple streak in her hair.

13 Q Did you take any action with regard to
14 whatever she was complaining about with regard to
15 Scientology?

16 A No.

17 Q Do you recall why you didn't take any action?

18 A Because everybody complained about
19 Scientology.

20 Q Did you tell anybody in HR or above you at the
21 company about her complaint?

22 A No.

23 Q To your recollection, was she asking you to do
24 anything about it, or was she just complaining.

25 A It just seemed like a gripe. Everybody griped

1 about the courses. And it's more about the courses
2 than it is even the church. And this is before I even
3 got into the church. So, you know, in sales, people
4 complain. And when you're a supervisor, you have to
5 listen to them complain. But I listened to them
6 complain as minimal as possible, and then move to
7 something positive, because when people complain, it
8 steals your juju, it steals your vibe and your ability
9 to close other deals. Like, you have to maintain
10 enthusiasm, or manufacture enthusiasm in sales. And
11 when somebody's complaining, it takes away from your
12 enthusiasm. So any time somebody goes into complaining
13 mode, I might be looking them in the eyes, but I'm not
14 even listening to what they're saying. It's going in
15 one ear and out the other, just placating them so I can
16 move on back to being productive.

17 Q Do you recall her complaining to you about any
18 of the orientation videos?

19 A No. In fact, if you read them, they're quite
20 glowing.

21 Q Just to clarify: During Grecia's employment,
22 at any time during Grecia's employment, did you
23 consider yourself a Scientologist, or were you taking
24 Scientology courses?

25 A When was she terminated?

1 Q She was terminated --

2 A No, no, I wasn't, because I turned to
3 Scientology after the primary.

4 Q In fact, you started doing Scientology after
5 this lawsuit was filed; correct?

6 A Uh-huh.

7 Q Is that a "yes"?

8 A Yes.

9 Q If you look at Exhibit 8, which are these
10 Non-Ops for Grecia?

11 A Okay.

12 Q Was Grecia presented with these Non-Optimum
13 Reports at the time of her termination?

14 A Yeah.

15 Q I note that on the first page, which is marked
16 PLTF1, there's no signature of recipient --

17 A Uh-huh.

18 Q -- by Grecia. Is there a reason that you can
19 recall why there's no signature for Grecia?

20 A Yeah. She lost it in the office, and refused
21 to sign anything.

22 Q Okay.

23 A And I said, "I'm not going to give you your
24 paycheck unless you sign some stuff." And at the very
25 least, I think she had to sign her final paycheck

1 breakdown, and I could release the check to her. So I
2 remember -- but her -- she started to -- I mean,
3 terminating people sucks. No matter if they're
4 justified or not, women crying sucks to see. And so
5 when you terminate somebody, you kind of have to put
6 your armor on emotionally, and get ready for them to
7 cry, get ready for them to freak out, plead for their
8 job, whatever the situation is. And she got quite
9 upset, and refused to sign the stuff. And I'm like,
10 "Well, then you're not getting your paycheck."

11 Q So she refused to sign PLTF01; correct?

12 A Oh, yeah. That's what that stands for. Yes.

13 Q And then two pages later, PLTF03, she refused
14 to sign that Non-Optimum Report as well; correct?

15 A Uh-huh. One of them signed, though. I don't
16 know what the difference is.

17 Q Right. If you turn to PLTF5, that one is
18 signed?

19 A Yeah.

20 Q Do you recall why she agreed to sign this one
21 and not the other two?

22 A I don't.

23 Q Was she also, you said -- sorry, there's one
24 more -- the fourth one.

25 A The fourth one, she signed.

1 Q Do you know why she agreed to sign this one
2 and not the others?
3 A I don't.
4 Q Okay. Then you believe there's a fifth one
5 about her GPS; correct?
6 A Yeah.
7 Q Do you recall whether or not she signed that
8 one?
9 A I don't think she did sign that one either.
10 Either I asked -- because Christy at the time was
11 working here still -- and I think I delegated the GPS
12 one to Christy to write up. But I know for sure there
13 was a write-up about the GPS.
14 Q Did Grecia ever tell you that she used her own
15 car?
16 A On one occasion, yeah, which didn't make any
17 sense to me because gas -- and at the time, she was
18 driving a Dodge pickup, which is a lot less economical
19 than a Smart Car on gasoline.
20 Q So the company provides the cars to the brand
21 ambassadors; correct?
22 A Yes.
23 Q Is there a policy that the brand ambassadors
24 are supposed to drive the company car and not their own
25 car?

1 A It is, because of the -- the company cars are
2 wrapped, meaning they're plastered in company logos.
3 And so it's free advertising with those funny-looking
4 cars driving around. But she didn't receive a write-up
5 for it. I just found it to be weird.
6 MR. GUTIERREZ: Two-minute break, Kristol?
7 MS. GINAPP: Yeah, sure.
8 (Recess taken from 12:42 p.m. to 12:47 p.m.)
9 BY MS. GINAPP:
10 Q I want to look at Exhibit 13 really quick, the
11 text messages. If you could turn to PLTF189?
12 A Okay.
13 Q This is where it appears there's some sort of
14 picture of text messages inserted into the text;
15 correct?
16 A Uh-huh.
17 Q Is this a picture that you sent, or a picture
18 of text messages that Grecia sent to you?
19 A I don't know.
20 Q Can you review it and see if that refreshes
21 your recollection?
22 A It says "S" on here, so that doesn't stand for
23 "Grecia." So I don't know.
24 Q Do you recall taking pictures of text messages
25 and sending them to Grecia?

1 A I mean, it looks like it's Grecia talking
2 about -- I mean, I remember saying that Brent was
3 violating HIPAA laws and he told multiple people that I
4 was in rehab. But like the font is different. I don't
5 get these texts.
6 Q When you checked your text messages earlier,
7 were these in your texts?
8 A I have a crappy phone. I was just recently
9 divorced, and so I switched from AT&T to Cricket. So
10 at the time, I just bought whatever crappy phone I
11 could buy that had smartphone capacity. And so my
12 phone doesn't have -- I have enough memory on my phone
13 to have Instagram and Facebook, and those are the only
14 apps I have. So I literally have to delete my texts as
15 they go.
16 Q Okay. So you don't know who "S" is?
17 A I don't know who "S" is.
18 Q Does your phone -- do the text messages look
19 like this when they come in? Do they have a "S" and
20 like there's a red person in a symbol, I guess?
21 A Before I learned how to use it, I believe the
22 red was me. Now I have a profile picture there. The
23 "S" doesn't make any sense to me because I think
24 that -- I don't know who "S" is. Grecia starts with a
25 "G." So that doesn't make sense to me.

1 Q Okay. So then turn to PLTF191. Do you
2 recognize these photographs that look, again on this
3 page and the following two pages, there are more
4 photographs of text messages. Do you recognize these?
5 A I remember talking about Aimee saying that
6 everybody had to -- that everybody had to do
7 coursework, but -- and pushing it down the line. But,
8 "They also went under oath, they're not forcing people,
9 are making it mandatory to take the courses, however I
10 have an e-mail from Aimee telling me it's mandatory and
11 for me to tell everyone else that is mandatory for them
12 to take those courses. Or they are fired?" That
13 doesn't -- I don't know. This doesn't really jibe.
14 It's like a repeat.
15 Q Okay. I want you to skip to the back of that
16 exhibit, the last three pages -- or -- yeah, the last
17 three pages, third from the last page. It says,
18 "Shawna Real Water," at the top. I think the Bates
19 stamp must be stuck under the black bar at the bottom.
20 MR. GUTIERREZ: I think it would be 198, 199.
21 BY MS. GINAPP:
22 Q There's no Bates on there, but it would be
23 198, 199. Do you see them, these ones right here?
24 A Yeah.
25 Q Okay. So correct me if I'm wrong. Do these

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1 look like -- those look like the texts that were taken
 2 pictures of?
 3 **A Oh, it's from Shawna.**
 4 **Q** So if you look at these, are these your text
 5 messages with Shawna, or is it your correspondence with
 6 Shawna?
 7 **A Perhaps.**
 8 **Q** Okay.
 9 **A Yeah.**
 10 **Q** Explain who Shawna is.
 11 **A Shawna is the head of human resources.**
 12 **Q** Current head of human resources?
 13 **A I sure hope so.**
 14 **Q** So she's the current head of human resources
 15 at Real Water?
 16 **A I think technically Aimee is, but she runs the**
 17 **post.**
 18 **Q** Aimee is like the VP or executive in charge of
 19 it? Would that be correct? And then Shawna does the
 20 daily work?
 21 **A Yes.**
 22 **Q** Okay. So why were you corresponding with
 23 Shawna in these, looks like two pages of text messages?
 24 **A Shawna -- I see value in Shawna. And Shawna**
 25 **is -- I have a friendship with her. And she was**

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1 **complaining to me about her frustrations there. She**
 2 **recently submitted a CSW to get a raise, and couldn't**
 3 **get the raise because she had to complete coursework to**
 4 **get the raise, and was venting with me.**
 5 **Q** And then you took screenshots of it and sent
 6 it to Grecia?
 7 **A I guess so.**
 8 **Q** Do you recall why you did that?
 9 **A I don't.**
 10 **Q** Then look at the very last page marked
 11 PLTF200.
 12 **A This looks like an e-mail from Aimee to**
 13 **somebody.**
 14 **Q** Do you recognize it as being to you?
 15 **A I don't have access to my e-mails. I haven't**
 16 **had access to my e-mails since I left. So it couldn't**
 17 **be to me.**
 18 **Q** This text message, or whatever this message
 19 is, e-mail or text, is dated 7-18-2016; correct?
 20 **A Although, it could have been to me. But I**
 21 **don't think it is to me.**
 22 **Q** Did you have the same phone then, on July
 23 18th, 2016, as you do now?
 24 **A No.**
 25 **Q** Do you have access to the information from

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1 your old phone, on that date?
 2 **A Yeah, but I don't think this is from my phone.**
 3 **Q** Okay. Do you recall sending anything like
 4 this to Grecia?
 5 **A I don't.**
 6 **Q** And when you were corresponding with Grecia
 7 since your termination -- sorry -- your separation from
 8 the company, separation from Real Water, did you at all
 9 have access to any e-mails with Real Water?
 10 **A No. I've been locked out of my e-mail**
 11 **since -- Shawna told me when I was locked out of my**
 12 **e-mails. I got locked out of e-mail when I was in**
 13 **Narconon. And then I contacted Aimee, and Aimee reset**
 14 **the password, and I had access to them again for a**
 15 **couple weeks. And then right after I came back, Shawna**
 16 **told me that I was -- they were changing the passwords,**
 17 **and that I was locked out of my e-mails again.**
 18 **Q** When you had your termination meeting with
 19 Grecia, was she given the opportunity to argue her side
 20 of the story?
 21 **A Not really.**
 22 **Q** Why not?
 23 **A Because it was pretty cut and dry. I mean,**
 24 **when I go into those meetings, my mind is already made**
 25 **up, you know. I already have a final paycheck cut.**

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1 **Q** Okay. Would it be fair to say that -- and I
 2 think you alluded to this in your testimony earlier --
 3 but would it be fair to say that prior to -- well,
 4 prior to your separation from Real Water, that you had
 5 a personal relationship with Brent Jones outside of the
 6 workplace?
 7 **A Uh-huh. It was so intertwined. Yes. Yeah,**
 8 **we had a friendship.**
 9 **Q** Okay. You referenced that before you went to
 10 Narconon, that you had been drinking alcohol, I assume;
 11 correct?
 12 **A Uh-huh.**
 13 **Q** At an increased frequency?
 14 **A Thursday to Sunday.**
 15 **Q** Would you say that was an increased frequency?
 16 **A Not for me.**
 17 **Q** Was it perceived that your drinking was
 18 interfering with work?
 19 **A No. The reality is, Brent lost his campaign**
 20 **because I wasn't involved. Laurel tanked it. And I**
 21 **really felt like Narconon was a reaction to a couple**
 22 **things. He lost his election, and my attitude was not**
 23 **positive.**
 24 **The night of the election of the primary,**
 25 **Laurel got drunk and tried to put hands on another**

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1 legislator, and I stepped in the line of fire, and the
2 anger turned towards me. And I decided at that moment,
3 there was no way I was going to work with her again.
4 So I told Brent, "I'm not going to be involved in your
5 campaign. If you want her involved, that's fine, I
6 won't be involved." So she ran his campaign, and lost.

7 And I felt like Narconon was really kind of a
8 punishment for not being involved. But also, it had a
9 lot to do with my attitude being crappy because I now
10 had Aimee Jones breathing down my throat micro-managing
11 me, which made me not want to work there.

12 Q Did Brent --

13 A So the better perception to think was that I
14 was drinking, or something, and that's why my attitude
15 had changed. My attitude had changed -- my drinking
16 was the same as it always was. I would drink -- I
17 would get bottle service on Thursday night, Friday
18 night, Saturday night. And that was my standard
19 operating procedure at the time.

20 Q So prior to going to Narconon, did Brent come
21 to you and say that he expressed that he felt like the
22 drinking was getting -- was interfering with your work
23 performance?

24 A No. I mean, it was right before I went to
25 Narconon he's like, "This is what it is. I can tell

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1 that you're not on drugs, but something is different."
2 I said, "Yeah, I'm drinking a few days a week." And
3 he's like, "Well, then you have to go to Narconon."

4 Q Just to be clear: Brent paid for you to go to
5 Narconon?

6 A He ultimately ended up paying for me to go to
7 Narconon. My paycheck was changed without me signing
8 anything. My paycheck was changed. My paycheck was
9 cut in half. I didn't agree to this. And the reason I
10 signed papers to separate from them was simply just to
11 get my paycheck paid back. But at the time, ultimately
12 I, through some sort of debt that I incurred from my
13 paychecks, was paying, co-paying for Narconon while I
14 was there.

15 And then it ended up, through our agreement,
16 that they ultimately ended up paying for the period of
17 time that I was at Narconon because they reimbursed me
18 for what was taken out of my paychecks.

19 Q Just to be clear: This was your paycheck
20 while you were gone at Narconon?

21 A Yes.

22 Q The company was continuing to pay you while
23 you were not working?

24 A I was still working. I was still managing my
25 accounts that Aimee was trying to burn down. As I was

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1 there, I still had to play damage control. She is not
2 a very friendly human being. And so every single
3 distributor that we have was constantly threatening to
4 drop us because of the way that she handled them.
5 Prior to me going to Narconon, she reached out to Los
6 Angeles Budweiser once, and left a voicemail. And Los
7 Angeles Budweiser said if they ever reached out to them
8 again, that they would drop us.

9 So I was still managing my juniors while I was
10 in Narconon, and was still communicating with my
11 Budweisers while I was there, shooting out e-mails to
12 people, and making sure that there was a company for me
13 to go back to.

14 Q Were you working full-time?

15 A I was working about six hours a day, which is
16 about the same amount of time I was working when I was
17 not in Narconon.

18 Q Did you ever ask to go anywhere other than
19 Narconon?

20 A I didn't want to go to Narconon. I didn't
21 have a choice.

22 Q Okay. But did you ask, ever suggest going
23 somewhere other than Narconon for rehab?

24 A I wanted to go to Malibu Passages. But it was
25 not a choice. It was either you go to Narconon, or you

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1 don't work here anymore. Either you don't get married
2 to this particular girl, or you don't work here
3 anymore. And so I chose to go to Narconon and maintain
4 my employment until I saw that it was straight up --
5 the brainwashing part, I couldn't handle that anymore.
6 I mean, I'm all about -- now I haven't had a drink of
7 alcohol or any substance since November 20th. So now
8 it's been months and months. I look 10 years longer
9 younger than I did before. My mind is clearer than it
10 has ever been. And so I saw some benefit to the
11 Narconon, the detoxification process, what they call
12 Purif. But once it got to the heavy-duty objectives
13 where I thought it was brainwashing, you know, I
14 objected to it. I couldn't do it. And I knew that
15 Brent would not agree with me on this. And so I just
16 had to leave. I had to coordinate a way to book
17 airfare, even though my money supply was cut off, to
18 get back to Las Vegas.

19 Q So prior to going to Narconon, you had been --
20 you testified that you had been taking some Scientology
21 courses; correct?

22 A Uh-huh.

23 Q I'm unclear, based upon your testimony,
24 whether or not that was voluntary, in your mind.

25 A Absolutely not.

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1 Q It was not voluntary?

2 A **Absolutely not. I have never --**

3 Q I'm sorry. Do you need to text, or do

4 you want to testify?

5 A **That's all right.**

6 Q Okay.

7 A **No, absolutely not. No, in June, it was laid**

8 **out to me if I wanted to continue with employment with**

9 **the company, I had to go to Orange County and start the**

10 **Purif process. And I didn't really object to it**

11 **until -- I mean, with Brent, you really -- you can't**

12 **really express your opinion. You don't have a choice.**

13 **When you're dealing with people that are this bold, the**

14 **only way that you survive is by agreeing.**

15 Q Okay. To be clear, you didn't object to it.

16 You actually signed a document saying that you were

17 doing it voluntarily, correct, the Purif?

18 A **I had no choice. But, yes.**

19 Q But you did sign it; correct?

20 A **I had no choice.**

21 Q My question is: You did sign the document

22 that said that you, being of sound mind, want to go

23 through the Purif process; correct?

24 A **I did sign it, but I had no choice.**

25 Q And then you also signed a document actually

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1 on the same day stating that you voluntarily wanted to

2 start learning Scientology; correct?

3 A **Yes. But, again, I had no choice. If you**

4 **knew Brent Jones, then you'd understand.**

5 Q So -- strike that.

6 A **I'm not suing Real Water.**

7 Q I understand. I just want to make sure that I

8 understood that you signed those, and you weren't

9 disputing signing them.

10 A **I mean, under duress -- let's be real -- I**

11 **absolutely signed them under duress, but I signed them.**

12 Q So what do the circumstances of Grecia's

13 termination -- how do they relate to the circumstances

14 of your separation with the company? Would you say

15 that they have anything to do with each other?

16 MR. GUTIERREZ: Objection. Form.

17 BY MS. GINAPP:

18 Q In your opinion?

19 A **In my opinion, they're two totally separate**

20 **things.**

21 Q Okay. And why is that?

22 A **I was forced to do Scientology religious**

23 **stuff. Again, I wasn't over courses. So I don't know**

24 **how much coursework she had to do. But if anything,**

25 **she would have done ABLE courses. She would have done**

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1 **Admin Tech. Until you get into, like, Course 8, or**

2 **whatever, when you "Ups and Downs" or "Personal Values**

3 **and Integrity," they're the Administrative Tech, how to**

4 **run a business, how to read, stuff like that.**

5 Q Until you get into those courses what? Sorry.

6 A **Oh. It's not religious, from what I've seen.**

7 **From doing the religious Scientology myself, it's not**

8 **religious.**

9 MS. GINAPP: Okay. I'll pass the witness.

10 FURTHER EXAMINATION

11 BY MR. GUTIERREZ:

12 Q You talked about signing those documents under

13 duress because of how Brent Jones is. What does that

14 mean?

15 MS. GINAPP: I'm going to object to form.

16 Foundation. Go ahead.

17 THE WITNESS: So the phenomena of Brent Jones

18 is kind of hard to explain. The reason the revolving

19 door is as big as it is -- I alluded to it before -- is

20 because of the screaming matches that go on before

21 Brent and Aimee. That's how they communicate. That's

22 just how they vibe. Like right now, even though this

23 is a confrontational lawsuit, and you all aren't BFFs,

24 right, because you're on the opposite side of the

25 table, you're still communicating in a civil manner.

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1 Q Right.

2 A **If Brent is mad at somebody, he's not**

3 **communicating with you in a civil manner. He's**

4 **screaming at you. Screaming at you to where the blood**

5 **vessels are popping out of your head, to where -- I've**

6 **seen him scream at his son, Blain, to where the blood**

7 **vessels are popping out of his head, to where Blain**

8 **gets so frustrated, he literally knocks everything off**

9 **of Brent's desk while there are other juniors, meaning**

10 **employees, in the office. That's just how the guy**

11 **operates. Either you agree with him or you don't agree**

12 **with him. If you don't agree with him, you don't work**

13 **there anymore. It's his way or the highway.**

14 BY MR. GUTIERREZ:

15 Q So he manages through fear? Fair to say?

16 A **Yes.**

17 MS. GINAPP: Objection. Form. Foundation.

18 BY MR. GUTIERREZ:

19 Q You said the only way to survive is by

20 agreeing with him. Now, how would an employee who has

21 a fear of losing their job make a complaint about these

22 courses involving religious undertones, and who would

23 they complain to actually get their matter heard?

24 MS. GINAPP: Objection. Form. Foundation.

25 THE WITNESS: I don't know. Good luck with

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1 that one.
 2 BY MR. GUTIERREZ:
 3 Q Do you see the issue? I mean, as far as --
 4 you testified earlier about Grecia making complaints to
 5 you about having to do the coursework, and you said one
 6 to two complaints a week regarding Scientology in the
 7 workplace, but that any action or any complaints would
 8 be futile. Nobody would do anything; correct?
 9 MS. GINAPP: Objection. Form. Foundation.
 10 Misstates prior testimony. Argumentative.
 11 THE WITNESS: No one has the power to do
 12 anything.
 13 BY MR. GUTIERREZ:
 14 Q Because ultimately everything ended with Brent
 15 or Aimee; correct?
 16 A Yes -- no, with Brent.
 17 Q With Brent. Brent would have not been
 18 receptive to an employee not wanting to do the
 19 coursework; correct?
 20 MS. GINAPP: Objection. Form. Foundation.
 21 THE WITNESS: Yeah, he would lose his shit.
 22 BY MR. GUTIERREZ:
 23 Q And by "lose his shit," he would actually flip
 24 out, like you testified to, to the point where there is
 25 no option but to agree with him; correct?

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1 A Or quit.
 2 MS. GINAPP: Objection. Form. Foundation.
 3 BY MR. GUTIERREZ:
 4 Q And that's -- why Brent wanted you to start
 5 this Purif process in June of 2016. That's months
 6 before any of these issues with drinking ever came up;
 7 correct?
 8 A Correct.
 9 Q So why did he want you to start the Purif
 10 process back then?
 11 A He felt that I was neglecting the company. So
 12 at the time, I was running seven Assembly races. And
 13 so either I had Brent pissed off at me, or I had Laurel
 14 pissed off at me the entire time. And that was just
 15 what Brent presented.
 16 Q Did you run his 2016 campaign?
 17 A We had a separation of responsibilities. I
 18 ran his -- what's called his ground game, which
 19 means -- ground game is in reference to phone calls and
 20 reference to door knocking. So as David can attest to,
 21 General Counsel for Real Water, I ran a ground game
 22 against him with the Diana Orrock ground game, and I
 23 actually paid walkers to follow David around, and to go
 24 after the doors that he had just knocked on to convert
 25 them back to us. So there's a separation. So I ran

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1 half of his campaign, not all of his campaign. I
 2 ran -- I'm the sales guy. So I do human-to-human
 3 relations, whether that's over the phone or in person.
 4 Q So when he had you start this Purif process in
 5 June, did he mention you going to Narconon at all?
 6 A He wanted me to do Narconon then, but I wasn't
 7 open to the idea, because I wasn't open to the idea of
 8 being gone and not working. So the compromise was to
 9 do the Purif at a Mission in Orange County, at a Church
 10 of Scientology in Orange County.
 11 Q When he wanted you to do Narconon in November,
 12 why did he send you to Florida and not just do one out
 13 here?
 14 A So the person that got him into the Church of
 15 Scientology, or that was his case supervisor back in
 16 the day 20 years ago, Kathy -- I can't remember her
 17 last name -- owns that Narconon in Florida.
 18 Q So he specifically picked out that location
 19 for you; correct?
 20 A Yes.
 21 Q You had no choice in that matter?
 22 A Correct.
 23 Q Was that even -- did those Narconon facilities
 24 even help with any type of rehab, or are they just a
 25 front for Scientology?

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1 MS. GINAPP: Objection. Form. Foundation.
 2 THE WITNESS: You'd have to interview a lot of
 3 people to go through them to have a -- I think they're
 4 just a front for Scientology.
 5 BY MR. GUTIERREZ:
 6 Q Now, back to Grecia's complaints of these
 7 Scientology-based courses in the workplace, or at least
 8 her opinion of it, who could she go to within the
 9 company at the time she was employed to remedy or
 10 address any of her complaints?
 11 A I think legally she could have gone to HR. I
 12 think we had some internal document that you could fill
 13 out. I don't know of anybody actually filling it out.
 14 Q Let's say she went to Christy in HR. What
 15 would Christy do?
 16 MS. GINAPP: Objection. Incomplete
 17 hypothetical.
 18 THE WITNESS: I can't imagine Christy doing
 19 anything.
 20 BY MR. GUTIERREZ:
 21 Q Because ultimately, it ends with Brent;
 22 correct?
 23 A Yeah. You'd have to go back to Brent. It's
 24 not like -- prior to this lawsuit, we weren't even
 25 thinking about being sued.

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1 Q You said Bonnie was, I guess, a believer of
2 the coursework and the principles of Scientology?
3 A Uh-huh.
4 Q Is it possible that some of Bonnie's beef or
5 complaints with Grecia was based upon Grecia not
6 wanting to do the coursework?
7 MS. GINAPP: Objection. Form. Foundation.
8 THE WITNESS: I don't know what her beef with
9 her really was. I just know there was a beef.
10 BY MR. GUTIERREZ:
11 Q With the GPS, did the employees know about the
12 GPS?
13 A Yeah.
14 Q Okay.
15 A Yeah. It's against the law to not inform
16 somebody if you're tracking them. In my political
17 campaigns, I would make every employee sign an
18 acknowledgment of a geo timestamp. If you record
19 somebody over the phone -- yes, the short answer is
20 yes. It's illegal to NSA somebody without their
21 permission.
22 Q Were there employees who were active
23 Scientologists that were given preferential treatment
24 than people who were not?
25 MS. GINAPP: Objection. Form. Foundation.

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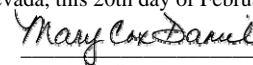
1 THE WITNESS: There really weren't any
2 Scientologists there that stayed working there. I
3 mean, Hiro ended up leaving. The only, like,
4 full-fledged -- I mean, Anthony, the highest paid
5 employee of Real Water is Anthony Randolph, and he's
6 absolutely not a Scientologist. He's refused to do any
7 of the courses.
8 BY MR. GUTIERREZ:
9 Q But in your dealings with Brent, if somebody
10 was an active Scientologist or doing all the
11 coursework, would they be given preferential treatment?
12 A I did it --
13 MS. GINAPP: I'm going to object. Form.
14 Foundation. Go ahead.
15 BY MR. GUTIERREZ:
16 Q Go ahead.
17 A I did it to make my life easier. I mean, I
18 didn't have a choice. But I knew that when I did the
19 courses, and I could speak in the vocabulary that they
20 use, it's something that he identified with, and I
21 could get what I wanted more often.
22 Q You said that your concern was making money,
23 profitability, but that you were being pressured to
24 pressure employees to do the coursework; is that
25 correct?

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1 MS. GINAPP: Objection. Misstates testimony.
2 BY MR. GUTIERREZ:
3 Q Is that correct? Yes?
4 A Yes.
5 Q Who pressured you to put that pressure on
6 employees?
7 A Brent and Aimee.
8 MR. GUTIERREZ: I have no further questions.
9 MS. GINAPP: Nothing further.
10 MR. GUTIERREZ: Jeramy, you're going to have
11 the opportunity to review your deposition transcript
12 and make any changes as far as typos or anything to the
13 transcript. You can waive off on that now, or if you
14 want to actually review the transcript and make
15 changes, you can. It's your option.
16 THE WITNESS: It's not my case. I don't care.
17 MR. GUTIERREZ: Okay. So you're comfortable
18 with everything you testified to. We're going to waive
19 off on him reading and signing. We're done.
20 (Thereupon, the deposition concluded at 1:16 p.m.)
21
22
23
24
25

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1 CERTIFICATE OF REPORTER
2 STATE OF NEVADA)
3) ss:
4 COUNTY OF CLARK)
5 I, Mary Cox Daniel, a Certified Court
6 Reporter licensed by the State of Nevada, do hereby
7 certify:
8 That I reported the deposition of JERAMY
9 EDGEL, commencing on Monday, February 13, 2017, at
10 10:11 a.m.
11 That prior to being examined, the
12 witness first duly swore or affirmed to testify to the
13 truth, the whole truth, and nothing but the truth; that
14 I thereafter transcribed my said shorthand notes into
15 typewriting and that the typewritten transcript is a
16 complete, true and accurate record of testimony
17 provided by the witness at said time.
18 I further certify (1) that I am not a
19 relative or employee of an attorney or counsel of any
20 of the parties, nor a relative or employee of any
21 attorney or counsel involved in said action, nor a
22 person financially interested in the action, and (2)
23 that pursuant to Rule 30(e), transcript review by the
24 witness was waived.
25 IN WITNESS WHEREOF, I have hereunto set
my hand in my office in the County of Clark, State of
Nevada, this 20th day of February, 2017.



MARY COX DANIEL, CCR 710, FAPR, RDR CRR